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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91218280
Party	Defendant Ibrahim Dabes dba Dabes Egyptian Imports
Correspondence Address	PAUL D BIANCO FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 E DIXIE HWY, STE 115 MIAMI, FL 33180-1244 UNITED STATES tmmiami@fggbb.com
Submission	Other Motions/Papers
Filer's Name	Paul D. Bianco
Filer's e-mail	tmmiami@fggbb.com
Signature	/Paul D. Bianco/
Date	06/24/2015
Attachments	resp-motion410Opp.pdf(101011 bytes) exhibit a - int.pdf(2262024 bytes) exhibit b - req.pdf(2272647 bytes) exhibit c - resp to req-int part 1.pdf(5031747 bytes) exhibit c - resp to req-int part 2.pdf(5182633 bytes) exhibit c - resp to req-int part 3.pdf(2085598 bytes) exhibit d - email disc issues.pdf(280180 bytes) exhibit e - pb list of deficiencies.pdf(296883 bytes) exhibit f - no more to add.pdf(294288 bytes) exhibit g - supplemental resp part 1.pdf(424769 bytes) exhibit h - motion to compel.pdf(1517735 bytes) exhibit i - board order.pdf(219572 bytes) exhibit j - sup answ.pdf(497537 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application No.	86/025,182		
For the Mark: AMY	GOLD TOBACCO	MOLAS	SES (design)
Published in the Office	<i>cial Gazette</i> on May	13, 2014	
Mya Saray, LLC,)	
)	
	Opposer,)	Opposition No.: 91218280
)	
v.)	
)	
Dabes, Ibrahim DBA)	
Dabes Egyptian Imports,)	
671	,)	
	Applicant.	Ś	
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APPLICANT'S RESPONSE TO OPPOSER 'S FIRST MOTION TO COMPEL

Applicant, Ibrahim Dabes ("Applicant"), by and through undersigned counsel and pursuant to 37 CFR Sec. 2.127(a) and the Federal Rules of Civil Procedure, hereby responds to Opposer's First Motion to Compel ("Motion") as follows:

INTRODUCTION

Counsel for Opposer, Mya Saray, LLC, mailed copies of "Plaintiff's First Set of Interrogatories to Defendant Dabes" and "Plaintiff's First Set of Requests for Production to Defendant Dabes" on January 20, 2015. Please see Exhibits A and B. Applicant requested a six (6) day extension to submit a response, which Opposer granted, and on March 2, 2015 Applicant timely served its discovery responses and documents. Please see Exhibit C.

The parties agreed to participate in a telephone conference, at the request of Opposer's counsel, regarding Applicant's discovery responses. Opposer delineated the following issues in his email of April 27, 2015 to discuss during the conference:

- "1. Reconsideration of marking all discovery production and answers as a whole as commercially sensitive.
- Reconsideration of disclosure and answers for discovery related to Dabes' specific hookahs.
 - 3. Arranging for inspection of physical samples.
 - 4. Indicating which documents are responsive to which requests for production.
- 5. Reconsideration of disclosure and answers for discovery related to design of specific hookahs.
- 6. Reconsideration of disclosure and answer for discovery related to alternative brands of Dabes." Please see Exhibit D.

The parties proceeded to discuss the above issues in a telephone conference the following day. In the conference, counsel for Opposer requested that Applicant reclassify the categories of the discovery answers, particularly to make those answers to the Request to Produce that were answered as "none" or "no documents" disclosable. However, no other specifics were provided by counsel for Opposer with regards to this request and this created some confusion for Applicant. In a later email, the undersigned requested a complete list of all deficiencies and requested changes; however, none was provided. Please see Exhibit E. During the telephone conference of April 28, the parties also discussed the Opposer's request to produce physical samples. Applicant pointed out that the products requested were no longer being sold in the United States (per the

answers to Interrogatories 33 and 34), and as such it was difficult (if at all possible) to obtain physical samples of these products in the United States. Finally, the parties discussed the objections raised in the interrogatories related to alternative brand designations and design of hookahs and specific hookahs. Counsel for Opposer did not raise any other concerns during the telephone conference. In fact, counsel for Opposer indicated in a later email that the issues presented during the conference were comprehensive: "I don't recall being tasked with sending over any description of deficiencies. Other than our meeting agenda, and our telephonic discussion, *I'm not sure that there is more to add.*" Please see Exhibit F.

The parties have another proceeding pending before this Board, Cancellation No. 92060249 ("the '249 Proceeding"), in which Opposer seeks cancellation of Applicant's US Registration No. 4,536,391. Following the telephone conference, Applicant made a good faith effort to address Opposer's concerns by filing supplemental answers in the '249 Proceeding. Please see Exhibit G. However, Applicant requested an extension of time to submit supplemental answers in this proceeding. The week prior to the deadline to submit supplemental answers, the Board issued an order regarding the consented amendment filed by Applicant in this proceeding and Applicant needed more time to consider the supplemental answers in light of the Board's order. Please see Exhibit I. Opposer did not respond to Applicant's request for an extension of time, but instead filed the Motion to Compel just two days after Applicant served its supplemental answers in the '249 Proceeding. Please see Exhibit H.

Although Opposer certifies that it has "made a good faith effort...to resolve with the Defendant the issues presented in [this] motion," Opposer disingenuously raises a myriad of new issues that it never before tried to resolve with Applicant. Additionally, Opposer's Motion consists of baseless accusations¹ that tend to obscure the pertinent facts at issue and countless challenges, which Opposer fails to support with relevant case law.²

ARGUMENTS

I. Opposer has not made a good faith effort to resolve the majority of the issues presented in part one of its Motion.

Opposer has failed to make a good faith effort to resolve the majority of the discovery issues raised in its Motion to Compel as required by TBMP Sec. 408.01, TBMP Sec. 523 and 37 CFR Sec. 2.120; accordingly, Opposer's Motion to Compel should be denied for lack of good faith to the extent that it requests the Board to act on matters that were not previously raised during the meet and confer process.

It is well established that the Board expects the parties in an inter partes proceeding to "cooperate with one another in the discovery process, and looks with extreme disfavor on those who do not." TMBP Sec. 408.01. To this end, the "meet and confer" requirement of 37 CFR Sec. 2.120 provides that, in the event the parties have been "unable to reach agreement," the moving party must make "a good faith effort, by conference or correspondence, to resolve with the other party or its attorney the issues

¹ Throughout the Motion, Opposer makes unwarranted accusations about Applicant and its products, such as accusing Applicant of being a free rider and of selling counterfeits. Please see Exhibit H.

² Throughout the Motion, Opposer cites cases that are completely unrelated to this proceeding; for example, Opposer cites wrongful termination cases like Momah v. Albert Einstein Medical Center, 164 F.R.D. 412, 417 (E.D.Pa.1996) and personal injury cases like Ostrander v. Cone Mills, Inc., 119 F.R.D. 417, 420 (D.Minn.1988), among others. While the cases might relate to discovery in general, they do not relate to discovery in a trademark opposition proceeding.

presented in the motion." TBMP Sec. 523.02. The purpose of the meet and confer requirement is to "relieve the Board of the burden of ruling on motions to compel in those cases where the parties could resolve their discovery disputes by agreement if they made a good faith effort to do so." Macmillan Bloedel Ltd., 203 U.S.P.Q. (BNA) ¶ 952 (P.T.O. Sept. 18, 1979).

The filing of a Motion to Compel that does not comply with the meet and confer requirements of 37 CFR Sec. 2.120 should be denied. Macmillan Bloedel Ltd., 203 U.S.P.Q. (BNA) ¶ 952 (P.T.O. Sept. 18, 1979) ("Inasmuch as applicant has indicated that no attempt was made to resolve the matter raised in the instant motion to compel prior to the filing thereof, the *motion will be given no consideration* at the present time.")

Additionally, it is the duty of each party to present all issues with the same specificity as in their discovery briefs in order to successfully "meet and confer." Amazon Technologies Inc. v. Wax, 93 USPQ2d 1702 (TTAB 2009) ("In order for the meet and confer process to be meaningful and serve its intended purpose, 'the parties must present to each other the merits of their respective positions with the same candor, specificity, and support during informal negotiations as during the briefing of discovery motions." (Quoting Nevada Power Co. v. Monsanto Co., 151 F.R.D. 118, 120 (D. Nev. 1993). In the present case, even though counsel for Applicant requested a "complete listing of the asserted deficiencies/requested changes" and "case law from you on the importance of the appearance of the product/producing physical samples in the likelihood of confusion analysis" during the meet and confer process, none was provided. Please see Exhibit F. Yet, Opposer was able provide the Board with a very detailed analysis of

its discovery issues only two days after Applicant submitted its supplemental responses. Please see Opposer's Motion, in particular, the chart in Exhibit 3.

Furthermore, as the Board in Amazon Technologies Inc. reasoned, "the meet and confer process cannot be truly complete until "after all the cards have been laid on the table,' by both parties." Amazon Technologies Inc. v. Wax, 93 USPQ2d 1702 (TTAB 2009) ("The purpose of the conference requirement is to promote a frank exchange between counsel to resolve issues by agreement or to at least narrow and focus the matters in controversy before judicial resolution is sought."). In the present case, it is clear that Opposer has failed to lay all the cards on the table. A comparison of the few issues delineated in the April 27, 2015 email and the numerous challenges raised in the Motion show the "cards" Opposer chose to withhold from the meet and confer process, which almost amount to a full deck. In particular, the issues raised in sections 1-2, 4-15, 17-18 and 20-21 under part one of the Motion were not discussed by the parties. These newly raised issues should have been resolved or at least narrowed before the Board without the necessity of filing this Motion. Indeed, the premature filing of the Motion to Compel has resulted in a waste of time, for both Applicant and the Board. Accordingly, it is respectfully submitted that Opposer's First Motion to Compel should be denied for lack of good faith effort, in the very least, to the extent that it requests the Board to act on matters that were not previously discussed by the parties.

II. Applicant has addressed the discovery issues presented in part two of Opposer's Motion.

The challenges raised in sections A and B under part two of the Motion are being addressed in Opposer's supplemental answers, which are being submitted to Opposer in conjunction with this response. Please see Exhibit J. Accordingly, Applicant respectfully submits that these concerns have been addressed and the Motion to Compel should be considered moot in this regard.

III. Applicant maintains that the interrogatories pertaining to alternate brand designations, the design of the hookahs and specific hookahs have no bearing on the issues presented in this proceeding.

Of the few discovery issues discussed during the meet and confer process, the parties did discuss Applicant's objections to interrogatories related to (1) alternative brand designations and (2) design of hookahs and specific hookahs. Please see Exhibit A, Interrogatory Nos. 3-4, and 33-34.

Firstly, Opposer takes issue with Applicant's objections to the interrogatories pertaining to "alternative brand designations" on the ground that they seek information that is irrelevant to the matter at issue in this proceeding and requests that the Board strike these objections. Please see pgs. 2 and 7-8 of Opposer's Motion to Compel, Exhibit H. It is well established that in an inter partes proceeding before the Trademark Trial and Appeal Board, a likelihood of confusion analysis is limited to a consideration of the marks identified in the Notice of Opposition. Fossil Inc., 49 U.S.P.Q.2d 1451 (P.T.O. Oct. 30, 1998) ("In summary, our likelihood of confusion analysis will be *limited to a*

consideration of applicant's mark and opposer's word mark FOSSIL in all normal manners of presentation."); Wine Oh! LLC, 2006, 2008 WL 3244035, at *2 (July 22, 2008) ([O]our likelihood of confusion analysis is limited solely to opposer's mark and goods in the pleaded application vis-à-vis the mark and goods in the subject application.")

To this end, the Board has held that interrogatories requesting information about "other marks" are not relevant to these proceedings. Volkswagenwerk Aktiengesellschaft, 181 U.S.P.Q. (BNA) 471 (P.T.O. Mar. 28, 1974) ("In interrogatory No. 12, opposer seeks information concerning trademarks and/or service marks other than "MUD BUG" that have been used by applicant or its predecessor in connection with the sale of its products or services. Here again, the information sought by opposer is clearly not relevant to the specific issue involved in this opposition proceeding and applicant's objections thereto are likewise proper."); Varian Associates, 188 U.S.P.Q. (BNA) 581 (P.T.O. Sept. 22, 1975) ("Applicant has asked opposer to list all marks other than "PALO ALTO" used by opposer. Such use is irrelevant to the issue of applicant's right to register its mark and opposer's claim of damage.") Just as the Board sustained the objections to interrogatories concerning "other marks" because they were not relevant to the issues involved in the respective inter partes proceedings, the Board should sustain Applicant's objections to the interrogatories concerning "alternative brand designations" as they are clearly meant to seek information that is not relevant to the issues presented in this proceeding.

Secondly, it is respectfully submitted that Opposer's interrogatories regarding the appearance of hookahs would more properly relate to issues raised in an unfair

competition action in a court rather than in this inter partes proceeding before the Trademark Trial and Appeal Board. In particular, Opposer appears to be concerned with the "product design difference[s]" between specific hookahs. Please see Interrogatory Nos. 33 and 34 in Exhibit A. In this regard, Opposer generally asserts that said design differences are "highly probative of a central matter in this proceeding" but does not explain how design differences between Opposer's and Applicant's hookahs are in any way relevant in a likelihood of confusion analysis of the respective marks.

The Board held in Gen. Foods Corp. that the appearance of the parties' goods is not relevant to the question of likelihood of confusion in an inter partes proceeding before the Trademark Trial and Appeal Board. Gen. Foods Corp., 165 U.S.P.Q. (BNA) 797 (P.T.O. Apr. 23, 1970) ("Opposer in its brief stresses the fact that the dress of the containers in which applicant's product is sold is *strikingly similar in appearance* to the dress of the containers for opposer's product, but this would be relevant, if at all, only in a civil iaction for unfair competition.) Similarly, in Crawford Fitting Co., the Board held that the opposer's assertions regarding the appearance of the products were not relevant to the issue of likelihood of confusion. Crawford Fitting Co., 135 U.S.P.Q. (BNA) 381 (P.T.O. Oct. 5, 1962) ("What are the patterns of which opposer complains? ...that applicant sells a product which in external appearance is substantially identical to the product sold by opposer...As is apparent, much of what opposer relies upon herein as indicative of likelihood of purchaser confusion relates to matters of unfair competition. Our jurisdiction is statutory and we cannot concern ourselves with the question of unfair competition in this proceeding.") The Opposer's assertions that these interrogatories seek information that is "highly probative" in this proceeding are clearly misguided. In actuality, it appears that Opposer is on a "fishing expedition," where it is seeking information beyond the scope of its claims. These interrogatories have been properly objected to on the ground that they seek information that is irrelevant to the matter at issue in this proceeding because, as the Board held in Gen. Foods Corp., this information would only be relevant in a civil action for unfair competition. Accordingly, Applicant's objections to discovery requests pertaining to design of hookahs and specific hookahs are proper and should be sustained.

IV. Applicant has sufficiently addressed the discovery request pertaining to the physical specimens of hookahs "AMY-018" and "Jinn"

Thirdly, the parties met and conferred over "arranging for inspection of physical samples." Please see Exhibit B, in particular Opposer's Request No. 9. In its request, Opposer seeks physical samples of "Subject Hookahs" which have been defined to include the hookah of Exhibit 2 labeled as "AMY-018" and the hookah of Exhibit 3 labeled as "Jinn." As noted above and as set forth in Applicant's answers to Interrogatories 33 and 34, hookahs "AMY-018" and "Jinn" are no longer sold in the US. Due to the unavailability of these products, it is respectfully submitted that this request in unduly burdensome. As noted above, counsel for Applicant explained these circumstances to counsel for Opposer during the meet and confer process. Nevertheless, Opposer disingenuously asserts in its Motion that Applicant has "without benefit of explanation" objected to this request. Please see page 20 of Exhibit H.

In an effort to satisfy Opposer's request, Applicant provided photographs of the "AMY-018" and "Jinn" hookahs. Please see Bates Stamped documents 00013 and

00118, respectively. As the United States Patent and Trademark Office routinely considers photographs to be adequate product specimens³, Applicant believes that it has sufficiently addressed the requirements of this discovery request. Additionally, Applicant answers the question with particularity by referencing Bates Numbers in its supplemental answers. Please see Exhibit J. Opposer clearly attempts to paint Applicant in a bad light by asserting that the answers are "a further attempt to evade the requests," when Applicant had fully cooperated and explained during the meet and confer process why it was unable to provide physical samples of these products.

Conclusion

This proceeding involves a relatively straightforward issue on the question of likelihood of confusion between the parties' marks. As the Board may recognize, Opposer's Motion consists of baseless accusations that tend to obscure the pertinent facts at issue and countless challenges, which Opposer fails to support with relevant case law. Additionally, Opposer has prematurely filed this Motion without making a good faith effort to resolve the majority of the discovery issues raised therein. Opposer's failure to lay all the cards on the table before filing its Motion—as required during the meet and confer process—demonstrate Opposer's lack of good faith when filing the Motion. For this reason, the Motion should be denied for lack of good faith to the extent that it requests the Board to act on matters that were not raised during the meet and confer process.

Of the few issues that Opposer introduced during the meet and confer process,

Applicant has addressed some in its supplemental answers by reclassifying the categories

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³ TMEP Sec. 904.

of the discovery answers and specifying which documents were responsive to which

request to produce. Applicant now narrows before the Board the remaining issues

discussed, i.e., the production of physical samples and the objections to interrogatories

pertaining to alternate brand designations and the design of the hookahs. As noted above,

the hookahs that Opposer requests are no longer sold in the US. Additionally, the

objections to interrogatories seeking information on alterative brand designations and the

design of the products are proper, as the Board does not consider other marks in inter

partes proceedings and the appearance of the goods of the parties is not a relevant factor

in a likelihood of confusion analysis. In view of the foregoing, Applicant respectfully

submits that these objections should be sustained and Opposer's Motion should be

denied.

Respectfully submitted,

Date: June 24, 2015

/ Paul D. Bianco /

Paul D. Bianco

Attorney for Applicant FLEIT GIBBONS GUTMAN

BONGINI & BIANCO PL 21355 East Dixie Highway, Suite 115

Miami, Florida 33180

Ph: 305 830-2600

Fax: 305 830-2605

Email: tmmiami@fggbb.com

12

CERTIFICATE OF SERVICE

It is hereby certified that a copy of this APPLICANT'S RESPONSE TO OPPOSER'S FIRST MOTION TO COMPEL was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Opposer, on this 24th day of June 2015.

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL

EXHIBIT "A"

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

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MIA	SARA	Υ.	டப	L.

Plaintiff,

Proceeding No. 91218280

v.

DABES, IBRAHIM

Defendant.

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT DABES

Plaintiff Mya Saray, LLC ("Plaintiff"), by its attorneys and pursuant to Fed. R. Civ. P. 33(a), requests Defendant Ibrahim Dabes to answer the following Interrogatories in writing and under oath or affirmation within thirty (30) days from the date of service. If any interrogatory cannot be answered in full after exercising due diligence to secure the information, please so state and answer the interrogatory to the extent possible, specifying the reason for any inability to answer the remainder of any such interrogatory and stating whatever information or knowledge presently is available concerning the unanswered portion of said interrogatory.

INSTRUCTIONS AND DEFINITION OF TERMS

The following instructions and definitions are to be utilized in complying with these requests:

- A. "Defendant" or "you" designate the named Defendant in this action, Ibrahim Dabes, including his counsel, agents, representatives, and other persons acting on their behalf, as well as all businesses operated by him.
- B. These Interrogatories are addressed to Defendant and any and all of their agents, representatives, attorneys, and other persons acting on their behalf. If the requested information or documents are known by Defendant to exist or are not in the possession, custody or control of Defendant, its agents, representatives, attorneys, or other persons acting on their behalf, Defendant should so indicate and provide the name of the person or entity maintaining the documents or possessing the information. Each discovery request not only calls for the knowledge of the Defendant but also for all knowledge or documentation that is available to the Defendant through reasonable inquiry, including inquiry of your representatives and agents.
- C. "Persons" shall mean and include a natural person, individual, partnership, firm, corporation or any kind of business or legal entity, its agents or employees.
- D. The term "document" is used herein with its customary broad meaning and thus includes, by way of illustration and not limitation, the following, whether written, printed, reproduced by any process including recordings, or

produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: tapes; notes; analyses; computer printouts; information maintained on computer disks or hard drives; correspondence; emails; video, audio, stenographic, magnetic, electronic digital or analog recordings or data; communications of any nature; recordings or transcriptions of voice mail messages; telegrams; letters; memoranda; notebooks of any character; summaries or records of personal conversations; diaries; routing slips or memoranda; reports; publications; photographs; minutes or records or tapes of meetings; transcripts of oral testimony or statements; reports and/or summaries of interviews; reports and/or summaries of investigations; agreements and contracts, including all modifications or revisions thereof; reports and/or summaries of negotiations; court papers; brochures; pamphlets; press releases; drafts, revisions or drafts; translations; tape recordings; documents, files or data download or retrieved from the Internet or from or through any online service or sever, and reports and dictation belts. Any document with any marks on any sheet or side thereof, including by way of illustration and not limitation, initials, stamped indicia, comments or notations of any character, not a part of the original text, or any reproduction thereof, is to be considered a separate document for purposes of this request. "Document" or "documents" include documents prepared by, for or at the direction of Defendants (or those acting or purporting to act on their behalf) and documents prepared by, for or at the direction of others.

E. When referring to a natural person, "identify" means that you shall state the person's full name, present or last known address, home and business

telephone numbers, and position of employment at the time in question. When referring to a company, "identify" means that you shall state the company's full name, legal status by type and state (e.g., a Delaware Corporation), present or last known address, business telephone and facsimile numbers.

- F. When referring to a document, "identify" means that you shall state the general nature of the document, the author or the originator, each addressee, all individuals designated to receive or who otherwise have received a copy of the document, date, title and general subject matter, present custodian of each copy and last known address of each such custodian.
- G. When referring to an oral statement or conversation, "identify" means that you shall state the date and place the oral statement or conversation was made or took place, the identity of each person who made, participated in, or heard any part of the oral statement or conversation, the substance of what was said by each person who made or participated in the oral statement or conversation, and the identity and present custodian of any written or any mechanical, electrical or computerized recording that recorded, summarized, or confirmed such oral statement or conversation.

H. As used herein:

- 1. The terms "reflect," "refer" or "relate to" are intended to have the broadest possible meaning, and include any logical or factual connection with the matters discussed.
- 2. The term "or" means "and/or".

- 3. Any word written in the singular shall include the plural and vice versa.
 - 4. The term "any" means "each, any and all."
 - 5. When appropriate, the use of the masculine also includes the feminine, and vice versa.
- I. Any other words used herein shall be defined according to standard American usage, as shown in a dictionary of the English language.
- J. If any documents responsive to any interrogatory have been lost, mutilated or destroyed, so state and identify each such document, and state to which interrogatory the document would have been responsive.
- K. If the Defendant lacks possession, custody or control of one or more documents that are responsive to a particular interrogatory, so state in response to such interrogatory.
- L. If you contend that you are entitled to withhold any information requested herein on the basis of the attorney-client privilege, the work-product doctrine, or some other ground, for each item information so withheld, state the basis upon which you contend you are entitled to withhold the information.
- M. These Interrogatories are continuing in nature so as to require you to provide supplemental information as set forth in F.R.C.P. 26(e).

SPECIFIC INSTRUCTIONS AND DEFINITIONS

1. <u>Defendant.</u> Defendant means not only Ibrahim Dabes but also his agents, officers, employees, representatives and attorneys, and any predecessors, subsidiaries, controlled, controlling and affiliated

- companies, and their agents, officers, employees, representatives and attorneys, to the fullest extent the context permits.
- 2. <u>United States.</u> The United States means the United States of America, and its territories and possessions.
- 3. AMY Brand. The AMY Brand includes the word "amy" applied by Defendant to a product or service, and all of the derivatives, including pictorial depictions, spoken versions, and logos including the word amy.
- 4. <u>AMY Logo</u>. The AMY Logo includes the brand that is the subject of U.S. Trademark Application No. 86,025,182
- 5. <u>Logo Design Elements</u>. The Logo Design Elements include those attributes of the AMY Logo other than the word "amy."
- 6. <u>Defendant Products</u>. The Defendant Products include tobacco and smoking articles, including cigarettes, cigars, smoking pipes, and shishas.
- 7. MYA Trademarks. The term MYA Trademarks includes the trademarks described in the Notice of Opposition for this action, and includes U.S. Trademark Regs. No. 3031439; 3031440; 3684312; 3684311; 3840577; 3845276, as well as the Plaintiff's mark as depicted in Exhibit 1 of this document, Plaintiff's First Set Of Interrogatories To Defendant Dabes.

- 8. MYA Products. MYA Products includes hookahs, components of hookahs, tobacco for hookah smoking, and accessories related to the use of hookahs.
- 9. <u>Retailer</u>. A Retailer includes an entity that vends, sells, leases, or provides a product directly to an end user of that product.
- 10. <u>Distributor</u>. A Distributor includes an entity vends, sells, leases, or provides products in quantity to Retailers.
- 11. <u>Subject Hookahs</u>. The Subject Hookahs include the hookah of <u>Exhibit</u>

 2 labeled as "AMY-018" and the hookah of <u>Exhibit 3</u> labeled as "Jinn."

INTERROGATORIES

INTERROGATORY NO. 1. Explain why (including the inspiration, significance, and meaning) Defendant selected the designation "AMY" as a brand for Defendant Products.

INTERROGATORY NO. 2. Explain the rationale for adopting the designation "AMY" in connection with Defendant's Products and why "AMY" was selected over alternative designations, with specific reference to those designations.

INTERROGATORY NO. 3. If Defendant utilizes alternative brand designations in connection with Defendant Products, identify such alternative brand designations by its literal elements (e.g. words) and design elements (e.g., illustrated components).

INTERROGATORY NO. 4. Explain other inspiration and meaning of the alternative brand designations responsive to INTERROGATORY NO. 3 how the Products for such other alternative brand designations relate to Defendant Products sold under the AMY Brand with specific reference to Defendant Product quality, Defendant Product quantity (generally at this time), Defendant Product manufacturing source, the characteristics of prospective purchasers of the Defendant Products, and other significant criteria.

INTERROGATORY NO. 5. Identify the manufacturing source of the Defendant Products under the AMY Brand, (i) if manufactured by a third party, by name and location, and (ii) if manufactured by Defendant, by address and manager of factory?

INTERROGATORY NO. 6. Describe the importation of Defendant's Products into the United States with specific reference to the:

- a. identities of customs brokers, warehousing, transport and shipping parties, handlers, and delivery agents;
- b. dates of importation, by arrival into the United States;
- c. quantities of Products divided into categories thereof (e.g., hookahs, hookah tobacco, etc.)

INTERROGATORY NO. 7. Identify each Distributor and Retailer known to Defendant authorized to sell Defendant Products in the United States. For each Distributor, include the geographic area, if any, to which the Distributor is permitted to distribute. (To the extent that the answer to this questions calls for the identification of more than 20 retailers, then Defendant need only list the 20 highest volume retailers)

INTERROGATORY NO. 8. Identify each hookah sold under the AMY Brand (including all internal names, code names, marketing names, and any other unique designations) and each hookah's date of first sale anywhere in the world, and its date of first sale under the AMY Brand, if different.

INTERROGATORY NO. 9. Identify the average distribution price and manufacture's suggested retail price, if any, of each hookah of INTERROGATORY NO. 8.

INTERROGATORY NO. 10. Identify the sales quantity in the United States of each hookah of INTERROGATORY NO. 8 by year.

INTERROGATORY NO. 11. Did you consider the affects of using the name AMY on Defendant Products notwithstanding Plaintiff's use of MYA with Plaintiff Products, and if so, what factors did you consider to be related to dispelling confusion?

INTERROGATORY NO. 12. Describe the extent to which Defendant searched for marks that might impede the use or registration of any AMY Brand for Defendant Products.

INTERROGATORY NO. 13. Identify the individuals most knowledgeable about the advertising, marketing, and/or promotion of each hookah of INTERROGATORY NO. 8.

INTERROGATORY NO. 14. Identify the individual most knowledgeable about the appearance and aesthetic properties of each hookah of INTERROGATORY NO. 8.

INTERROGATORY NO. 15. Describe in detail the date and circumstances under which Defendant first learned of each of the MYA Trademarks, including but not limited to, the persons that became aware of each of the MYA Trademarks, and all steps and actions taken, with respect to the design, development, offer for sale, and sales of Defendant Products identified in response to INTERROGATORY NO. 8, including any efforts by Defendant to avoid confusion between MYA Trademarks and the AMY Brand.

INTERROGATORY NO. 16. Identify each and every person with knowledge of any and all instances where Defendant received mail, orders, deliveries, telephone calls, bill, payments, invoices, or any other communications referring to or inquiring about either Plaintiff or the MYA Trademarks.

INTERROGATORY NO. 17. Identify all trade shows attended by Defendant, including name of trade show, date, and location, within the past four (4) years in which Defendant marketed Defendant Products.

INTERROGATORY NO. 18. Identify each and every person with knowledge of any and all instances where Defendant obtained any knowledge or information regarding any confusion whatsoever on the part of any person about the source,

affiliation, or sponsoring of any of Plaintiff Product and the source, affiliation, or sponsoring of Defendant Products.

INTERROGATORY NO. 19. State in detail all facts upon which Defendant bases its denial of likelihood of confusion of any of the MYA Trademarks and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and thins relating to any such facts, including information that refutes Defendant's denial.

INTERROGATORY NO. 20. State in detail all facts upon which Defendant bases any defense raised by Defendant in this action and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and thins relating to any such facts, including information that refutes Defendant's denial.

INTERROGATORY NO. 21. State the exact date(s) on which Defendant will rely as to when its use of the AMY Logo commenced in connection with the sale or distribution of each constituent (e.g., cigarettes) of the Products.

INTERROGATORY NO. 22. Identify all documents, purchase orders, invoices, labels, flyers, brochures, other advertising or any writing whatsoever that Defendant will rely upon to establish the date(s) specified in answer to INTERROGATORY NO. 21.

INTERROGATORY NO. 23. With respect to the first use(s) of the marks of the AMY Logo in connection with the sale of each product and/or service identified in above INTERROGATORY NO. 21, state:

- (a) Each manner in which the applied-for designation was used, e.g. by affixing to containers, labels, or in newspaper advertising or fliers;
- (b) If the applied-for designation was printed on containers for the product or on labels, the name and address of the person(s) or organization(s) which printed them;
- (c) If the applied-for designation was used in brochures or fliers, the name and address of the person(s) or organization(s) which printed them;
- (d) If the applied-for designation was used in media advertising, the name and address of the person(s) or organization(s) which advertised them;
- (e) Whether the product and/or service was sold;
- (f) Whether the product and/or service was offered free of charge;
- (g) The name and address of the person(s) or organization(s) to whom the

product and/or service was sold; and

(h) Whether the sale of each product under the applied-for designation has been continuous from each date specified in above INTERROGATORY NO. 21 to the present.

INTERROGATORY NO. 24. Describe and identify the channels of trade in the United States of each Product.

INTERROGATORY NO. 25. Identify each item of sales literature, including brochures and fliers produced by or for Applicant for distribution in the United States to advertise each of the Products.

INTERROGATORY NO. 26. List all geographic areas (by city and state) in which Applicant sells each of the Products.

INTERROGATORY NO. 27. List all other media, not already identified, where Applicant has advertised each of the Products, state the amount expended by Defendant in the United States in the advertisement of each Product.

INTERROGATORY NO. 28. For each calendar year since commencement of use the AMY Brand or applied-for .designation in connection with the sale of each of the Products, state the amount of sales by Defendant in the United States of each of the Products.

INTERROGATORY NO. 29. Identify the Defendant's predecessors-in-interest, and all of its subsidiaries and affiliated companies, and the officers, directors, employees, agents and representatives thereof.

INTERROGATORY NO. 30. Identify all persons, businesses, and entities involved in the proliferation of each Subject Hookah categorized by each Subject Hookah and by the following stages of development:

- a. the creation of each Subject Hookah, including its conception;
- b. the design of each Subject Hookah;
- c. the development of each Subject Hookah;
- d. the production of each Subject Hookah;
- e. the manufacture of each Subject Hookah, including quantities manufactured for Defendant;
- f. the transfer of each Subject Hookah to any property owned, leased, controlled, or accessed for commercial purposes by the Defendant; and
- g. the marketing and advertisement of each Subject Hookah.

INTERROGATORY NO. 31 Identify each source, quantity, and dollar amount of each Subject Hookah sold by Defendant in the United States arranged with reference to each Subject Hookah and each transaction.

INTERROGATORY NO. 32 Identify each commercial purchaser, the total quantity, and total dollar amount of each Subject Hookah vended by Defendant in the United States, arranged with reference to each Subject Hookah and commercial purchaser (together with a single "catch-all" category titled "direct consumer purchases").

INTERROGATORY NO. 33. Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as AMY-018 and the Econo-MYA QT depicted in Exhibit 4.

INTERROGATORY NO. 34. Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as Jinn and the MYA QT depicted in Exhibit 5.

INTERROGATORY NO. 35. Identify any and all documents responsive to the foregoing interrogatories or other Document Request issued by Plaintiff in this action which are lost or unavailable and identify the date(s) the loss or unavailability was first discovered, the person(s) who first discovered the loss or unavailability and the person(s) most knowledgeable about the contents of such lost or unavailable documents.

INTERROGATORY NO. 36. Identify all persons who participated in any way in the preparation of the answers or responses to these interrogatories and state specifically, with reference to interrogatory numbers, the area of participation of each such person (excluding only Applicant's lawyers or their representatives).

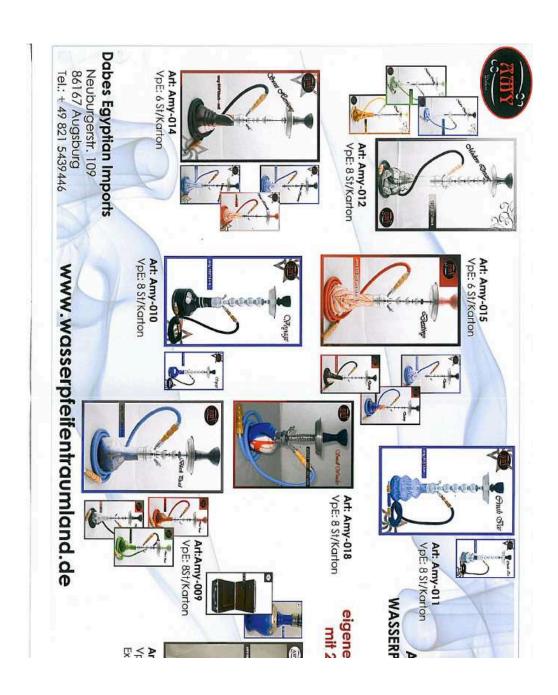
INTERROGATORY NO. 37. Identify any study, research, focus group, testing or similar validation procedure employed by Defendant or any person or entity at Defendant's request or on behalf of Defendant to determine the presence and/or absence of any confusion between Plaintiff's Products and the Defendant's Products when offered under the applied-for designations or AMY Brand generally.

DATED: January 20, 2015.

M. Keith Blankenship (VSB #70027) Attorney for Plaintiff Da Vinci's Notebook, LLC 10302 Bristow Center Dr. No. 52 Bristow, VA 20136

Phone: (703) 581-9562 keith@dnotebook.com





Name:	
Anschrift:	
Telefon:	
Datum:	

Dabes Egyptian Imports Neuburgerstr. 109 86167 Augsburg Tel: +49 821 5439446



Preisliste /Bestellformular

	-				
1		Jinn	Bestelinr.qt-0003	Preis/ ab 1 Kart.	Preis /3 Karı
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	grün	amber		13,50 €	12,00 €
×	violett	blau	DABES	_	
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		Crazy Dots	Bestellnr.id760-1	Preis/ ab 1 Kart.	Preis /3 Kort
	1 1 1 11	blau			
	auch mit Koffer	schwarz		15,00 €	12,50€
		grün	DABES	20,00 €	15,50 €
-		amber	Uldowalisi	(mit Koffer)	(mit Koffer)
-	Cra	azy Dots Special Art	Bestelinr. Id760a-1	Preis/ ab 1 Kart.	Preis /3 Kart
	amber	red white	-	16,00 €	14,00 €
-	blue white	green blue	DABES		
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T	Memory		Bestellnr. id580-1	Preis/ ab 1 Kart.	Preis /3 Kart
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			1 400	Freisy ab 1 Kart.	Preis /3 Kart.
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400		braun	DABES	20,00 €	26,00€
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-		Wallah	I Partallas ana posso		
_		walian	Bestellnr. egs-0058_n	Preis/ ab 1 Kart.	Preis /3 Kort.
)	blau	grün	*	13,50 €	12,50 €
1	schwarz	amber	DABES		
	rot		HOOKAHS		la constant

BRIDGE CHARLE		Baghira	Bestellnr		Preis/ ab 1 Kart.	Preis /3 Kart.
*	auch mit Koffer			AUVUA		
1	silber-blau	kupfer-rot	wp100-1		34,50 €	31,00 €
(T	silber-grün	kupfer-transparent	wp100-2	DEDEC	37.50 €	34.00 €





CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the forgoing PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT DABES has been served on counsel for Applicant by mailing said copy via First Class Mail, postage prepaid to:

Paul D. Bianco Fleit Gibbons Gutman Bongini & Bianco PL 21355 E Dixie Hwy Ste 115 Miami, Florida 33180-1244 United States

This 20th day of January 2015.

Ву	: _				
	M.	Keith	Blan	kens	hip

EXHIBIT "B"

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MYA SARAY, LLC,

Plaintiff,

Proceeding No. 91218280

v.

DABES, IBRAHIM

Defendant.

PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANT DABES

Plaintiff Mya Saray, LLC ("Plaintiff"), by its attorneys and pursuant to Fed. R. Civ. P. 26 and 34, requests Defendant Ibrahim Dabes ("Dabes") to respond to the following Requests for Production within thirty (30) days from the date of service. Responsive documents should be produced at Da Vinci's Notebook, LLC at 10302 Bristow Center Dr., No. 52; Bristow, VA 20136. These Requests are continuing in nature, so as to require the filing of supplemental responses if additional or different information is obtained before trial.

DEFINITIONS

Unless the terms of a particular Request specifically indicate otherwise, the following definitions are applicable throughout these Requests and are incorporated into each specific Request for Production:

- 1. "Defendant" or "you" designated as the named Defendant in this action, Ibrahim Dabes, including his counsel, agents, representatives, and other persons acting on their behalf, as well as all businesses operated by him.
- 2. "Plaintiff" means/refers to Mya Saray, LLC, including each and every one of its divisions, subsidiaries, affiliates, predecessors and successors, and all of its current or former officers, employees, directors, representatives, contractors or agents, attorneys and all persons acting for or on its behalf.
- 3. The term "this action" means/refers to the litigation styled *Mya Saray*, *LLC v. Dabes, Ibrahim*, Proceeding No. 91218280, pending in the Trademark Trial and Appeal Board.
- 4. "Complaint" means the Notice of Opposition filed by Plaintiff in the litigation referenced in Paragraph 3 above.
- 5. "Person" or "persons" shall mean any natural person, sole proprietorship, corporation, partnership, limited partnership, limited liability company, association, group, organization, federal, state or local government or governmental entity and their parent entities, subsidiaries, affiliates, divisions, predecessors and successors in interest and present and former directors, officers, executives, partners, members, employees, agents or representatives.
- 6. The term "document" should be understood in its broadest permissible scope under the Federal Rules of Civil Procedure, and includes, by way of illustration and not limitation, the following, whether written, printed, reproduced by any process including recordings, or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: tapes;

notes; analyses; computer printouts; information maintained on computer disks or hard drives; correspondence; emails; video, audio, stenographic, magnetic, electronic digital or analog recordings or data; communications of any nature; recordings or transcriptions of voice mail messages; telegrams; letters; memoranda; notebooks of any character; summaries or records of personal conversations; diaries; routing slips or memoranda; reports; publications; photographs; minutes or records or tapes of meetings; transcripts of oral testimony or statements; reports and/or summaries of interviews; reports and/or summaries of investigations; agreements and contracts, including all modifications or revisions thereof; reports and/or summaries of negotiations; court papers; brochures; pamphlets; press releases; drafts, revisions or drafts; translations; tape recordings; documents, files or data download or retrieved from the Internet or from or through any online service or sever, and reports and dictation belts. Any document with any marks on any sheet or side thereof, including by way of illustration and not limitation, initials, stamped indicia, comments or notations of any character, not a part of the original text, or any reproduction thereof, is to be considered a separate document for purposes of this request. "Document" or "documents" include documents prepared by, for or at the direction of Defendant (or those acting or purporting to act on Defendant's behalf) and documents prepared by, for or at the direction of others.

7. "Communication" means any statement, question, command or interjection, whether made orally, visually, in writing, or by mechanical device, and whether for internal or external use.

- 8. "Asset" or "Property" refers to any interest in real or personal property. Real property means real estate. Personal Property means, but is not limited to, automobiles, furniture, antiques, cash value insurance, securities, bonds, patents and loans or contract rights owed to you. It also includes, but is not limited to, any interest in a pension, profit-sharing, stock option, stock grant, or retirement plan, whether vested or not, as well as bank accounts, credit union accounts, brokerage accounts, stock, bonds, mutual funds, Employee Savings Plans or any other rights or claims.
- 9. "Income" means money from any source, whether wages, selfemployment, dividends, interest, capital gains, support, state aid, etc., whether or not taxable. It also includes overtime and bonuses.
- 10. "Investments" means such things as stocks, bonds options, precious metals or gems, antiques, collectibles or interests in businesses.
- 11. When referring to a natural person, "identify" means state the person's full name, present or last known address and place of employment, home and business telephone numbers, and position of employment/job title. When referring to a company, "identify" means state the company's full name, legal status by type and state (e.g., a Michigan Corporation), present or last known address, business telephone and facsimile numbers.
- 12. When referring to a document, "identify" means state the general nature and subject matter of the document; the exact name and title by which you refer to it; the author or the originator; each addressee; all individuals designated to receive or who otherwise have received a copy of the document, date and all serial

or identifying numbers, if any; the location and identity of the present custodian of each copy and last known address of each such custodian.

13. When referring to an oral statement or conversation, "identify" means state the date and place the oral statement or conversation was made or took place, the identity of each person who made, participated in, or heard any part of the oral statement or conversation, the substance of what was said by each person who made or participated in the oral statement or conversation, and the identity and present custodian of any written or any mechanical, electrical or computerized recording that recorded, summarized, or confirmed such oral statement or conversation.

14. As used herein:

- a. The terms "reflect," "refer" or "relate to" are intended to have the broadest possible meaning, and include any logical or factual connection with the matters discussed.
- b. The term "or" means "and/or".
- c. Any word written in the singular shall include the plural and vice versa.
 - d. The term "any" means "each, any and all."
 - e. When appropriate, the use of the masculine also includes the feminine, and vice versa.
- f. Any other words used herein shall be defined according to standard American usage, as shown in a dictionary of the English language.

- 15. If any documents responsive to any request have been lost, mutilated or destroyed, so state and identify each such document, and state to which request the document would have been responsive.
- 16. If the Defendant lacks possession, custody or control of one or more documents that are responsive to a particular request, so state in response to such request.
- 17. If you contend that you are entitled to withhold any information requested herein on the basis of the attorney-client privilege, the work-product doctrine, or some other ground, for each item information so withheld, state the basis upon which you contend you are entitled to withhold the information.

SPECIFIC DEFINITIONS

- 1. <u>Defendant.</u> Defendant means not only Ibrahim Dabes but also his agents, officers, employees, representatives and attorneys, and any predecessors, subsidiaries, controlled, controlling and affiliated companies, and their agents, officers, employees, representatives and attorneys, to the fullest extent the context permits.
- 2. <u>United States.</u> The United States means the United States of America, and its territories and possessions.
- 3. AMY Brand. The AMY Brand includes the word "amy" applied by Defendant to a product or service, and all of the derivatives, including pictorial depictions, spoken versions, and logos including the word amy.

- 4. <u>AMY Logo</u>. The AMY Logo includes the brand that is the subject of U.S. Trademark Application No. 86,025,182
- 5. <u>Logo Design Elements</u>. The Logo Design Elements include those attributes of the AMY Logo other than the word "amy."
- 6. <u>Defendant Products</u>. The Defendant Products include tobacco and smoking articles, including cigarettes, cigars, smoking pipes, and shishas.
- 7. MYA Trademarks. The term MYA Trademarks includes the trademarks described in the Notice of Opposition for this action, and includes U.S. Trademark Regs. No. 3031439; 3031440; 3684312; 3684311; 3840577; 3845276, as well as the Plaintiff's mark as depicted in Exhibit 1 of this document, Plaintiff's First Set of Requests for Production to Defendant Dabes.
- 8. MYA Products. MYA Products includes hookahs, components of hookahs, tobacco for hookah smoking, and accessories related to the use of hookahs.
- 9. <u>Retailer</u>. A Retailer includes an entity that vends, sells, leases, or provides a product directly to an end user of that product.
- 10. <u>Distributor</u>. A Distributor includes an entity vends, sells, leases, or provides products in quantity to Retailer.
- 11. <u>Subject Hookahs</u>. The Subject Hookahs include the hookah of <u>Exhibit</u>

 2 labeled as "AMY-018" and the hookah of <u>Exhibit 3</u> labeled as "Jinn."

INSTRUCTIONS

These Requests for Production are addressed to Defendant Ibrahim Dabes and any and all of his agents, representatives, attorneys, and other persons acting on his behalf. If the requested information or documents are known by Defendant to exist but are not in the possession, custody or control of Defendant, his agents, representatives, attorneys, or other persons acting on his behalf, Defendant should so indicate and provide the name of the person or entity maintaining the documents or possessing the information. Each discovery request not only calls for the knowledge of the Defendant but also for all knowledge or documentation that is available to the Defendant through reasonable inquiry, including inquiry of your representatives and agents. If any documents responsive to any request have been lost, mutilated or destroyed, so state and identify each such document, and state to which request(s) the document would have been responsive. If the Defendant lacks possession, custody or control of one or more documents that are responsive to a particular request, so state in response to such request.

If you contend that you are entitled to withhold any information requested herein on the basis of the attorney-client privilege, the work-product doctrine, or some other ground, for each item of information so withheld, state the basis upon which you contend you are entitled to withhold the information. All responsive documents or tangible items should be sequentially paginated (a/k/a Bates Stamp

Numbered). These Requests for Production are continuing in nature so as to require you to provide supplemental information as set forth in F.R.C.P. 26(e).

DOCUMENT REQUESTS

REQUEST NO. 1: All documents that are identified in, or should have been identified in, or concern or relate to your answers to Plaintiff's First Set of Interrogatories to Defendant Dabes, including but not limited to, any documents you used or referred to in answering the Interrogatories.

REQUEST NO. 2: All licenses or other documents provided to you constituting permission from a government entity or subdivision – federal, state or local – to perform acts in commerce, including those related to buying/selling of tobacco and related products, permissions for importation of goods, zoning variances, etc.

REQUEST NO. 3 All documents that reflect or reference a sale of any Subject Hookah to any Distributor in the United States.

REQUEST NO. 4 All documents that reflect or reference a sale of any Subject Hookah to any Retailer in the United States.

REQUEST NO. 5 All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Distributor in the United States.

REQUEST NO. 6 All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Retailer in the United States.

REQUEST NO. 7 All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Distributor in the United States.

REQUEST NO. 8 All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Retailer in the United States.

REQUEST NO. 9 A physical specimen of each Subject Hookah.

REQUEST NO. 10 All documents and things that relate or refer to, or describe Defendant's inventory of hookah products physically located in the United States.

REQUEST NO. 11 All documents that relate or refer to, or describe, the locations for physical storage or warehousing of Defendant Products or packaging for Defendant Products in the United States.

REQUEST NO. 12 All documents that relate or refer to, or result from, the Defendant's importation of Defendant Products into the United States since the adoption of the AMY Brand or commercialization of the Subject Hookahs (whichever is earlier). This will include correspondence, invoices, and any other documents from manufacturers, importers, freight forwarders, customs agents, and others involved in the importation process.

REQUEST NO. 13 All documents and things that refer or relate to the purchase or ordering of packaging with the AMY Logo or AMY Brand.

REQUEST NO. 14 All documents and things that refer or relate to the creation, design, and appearance of the Subject Hookahs, including the creation design and appearance of alternatives.

REQUEST NO. 15 All documents and things that refer or relate to the creation, design, and appearance of the AMY Logo, including the creation design and appearance of alternatives.

REQUEST NO. 16 All documents and things that refer or relate to the creation, design, and appearance of the AMY Brand, including the creation design and appearance of alternatives.

REQUEST NO. 17 All documents and things relating or referring to design differences between the Subject Hookahs and any Plaintiff hookah.

REQUEST NO. 18 All documents and things that refer or relate to communications between the Defendant and between any person involved in the design, production, shipping, or storage of the Subject Hookahs.

REQUEST NO. 19 All documents and things that refer or relate to any complaint from any consumer, Retailer, or Distributor regarding any Subject Hookah or Defendant Product bearing the AMY Logo or AMY Brand.

REQUEST NO. 20 All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products.

REQUEST NO. 21 All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs.

REQUEST NO. 22 All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs in the United States.

REQUEST NO. 23 All invoices, media, schematics, proofs, drafts, and other documents related to the creation of the AMY Logo or the AMY Brand, including any trademark clearance opinions or contracts with third party branding consultants.

REQUEST NO. 24 All documents characterizing any belief by a third party that a MYA Product or a Defendant Product are from a common source (including, believing a MYA Product to be a Defendant Product, vice versa, believing that Plaintiff and Defendant share a common manufacturing source, etc.).

REQUEST NO. 25 All documents characterizing a design of a MYA Product or MYA Trademark.

REQUEST NO. 26 All documents and things related to the ability of a Retailer or Distributor or end-user to order the Subject Hookahs and Defendant Products (e.g., catalogues, product specifications, etc.).

REQUEST NO. 27 All documents and things that refer or relate to the submission, review, clearance, rejection, approval, or registration with any governmental agency or supplier of any aspect of the Subject Hookahs or the AMY Brand or AMY Logo.

REQUEST NO. 28 All documents and things that refer or relate to the costs of manufacturing, acquiring parts and materials for, and Defendant's purchase (if any) of the Subject Hookahs.

REQUEST NO. 29 All documents and things relating to visits and communications to any store, retail outlet, or other business engaged in the sale of Defendant Products in the United States visited by any employee, representative, agent, official, executive and/or director of the Defendant for purposes relating to creating or continuing sales of Defendant Products.

REQUEST NO. 30 All Documents and things that describe, illustrate, or depict Your corporate or organizational structure, or any group assignment, including, but not limited to, organizational charts.

REQUEST NO. 31 Documents and things concerning your document retention policies.

REQUEST NO. 32 All documents constituting or concerning reports prepared by any expert whom you expect to call at trial, including draft reports.

REQUEST NO. 33 All documents provided by you to any expert witness retained by you for this action.

REQUEST NO. 34 Any and all statements taken of any person regarding any aspect of Plaintiff's claims or the allegations in this action or any defense to those claims or allegations.

REQUEST NO. 35 All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your First Affirmative Defense (Failure to State a Claim).

REQUEST NO. 36 All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Second Affirmative Defense (Absence of Likelihood of Confusion).

REQUEST NO. 37 All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Third Affirmative Defense (Lack of Damages).

REQUEST NO. 38 All documents that relate to, reflect, evidence, or

constitute the factual and/or legal explanation, ground, or rationale for your Fourth

Affirmative Defense (Estoppel).

REQUEST NO. 39 All documents that relate to, reflect, evidence, or

constitute the factual and/or legal explanation, ground, or rationale for your Fifth

Affirmative Defense (Laches).

REQUEST NO. 40 All documents that relate to, reflect, evidence, or

constitute the factual and/or legal explanation, ground, or rationale for your Sixth

Affirmative Defense (Acquiescence).

DATED: January 20, 2015.

M. Keith Blankenship (VSB #70027)

Attorney for Plaintiff Da Vinci's Notebook, LLC 10302 Bristow Center Dr. No. 52

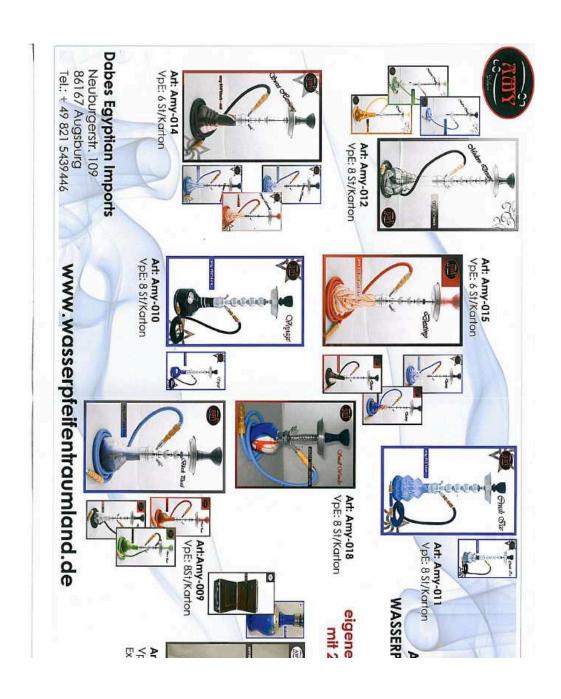
Bristow, VA 20136

Phone: (703) 581-9562

keith@dnotebook.com

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Dabes Egyptian Imports Neuburgerstr. 109 86167 Augsburg Tel: +49 821 5439446



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		braun schwarz		HOORAHS		
		braun	Bestellnr.	egs-0058 n	28,00 € Preis/ ab 1 Kart.	Preis /3 Kort.
	hlau	braun schwarz Wallah	Bestellnr.	HOORAHS	Preis/ ab 1 Kart.	Preis /3 Kort.
	blau	braun schwarz Wallah grün	Bestellnr.	egs-0058_n		
	blau schwarz rot	braun schwarz Wallah	Bestellnr.	HOORAHS	Preis/ ab 1 Kart.	Preis /3 Kort
	schwarz	braun schwarz Wallah grün amber		egs-0058_n	Preis/ ab 1 Kart. 13,50 €	Preis /3 Kort. 12,50 €
)	schwarz rot	braun schwarz Wallah grün amber	Bestellnr.	egs-0058_n	Preis/ ab 1 Kart.	Preis /3 Kort.
)	schwarz rot	braun schwarz Wallah grün amber		egs-0058_n	Preis/ ab 1 Kart. 13,50 €	Preis /3 Kort. 12,50 €





CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the forgoing PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANT DABES has been served on counsel for Applicant by mailing said copy via First Class Mail, postage prepaid to:

Paul D. Bianco Fleit Gibbons Gutman Bongini & Bianco PL 21355 E Dixie Hwy Ste 115 Miami, Florida 33180-1244 United States

This 20th day of January 2015.

Ву	: _				
	M.	Keith	Blan	kensh	ip

EXHIBIT "C"

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application No. 86/025,182 For the Mark: AMY GOLD TOBAC Published in the <i>Official Gazette</i> on	` _ /
Mya Saray, LLC,)
Opposer,) Opposition No.: 91218280
v.	
Dabes, Ibrahim DBA	j v v v v v v v v v v v v v v v v v v v
Dabes Egyptian Imports,	
Applicant.)

RESPONSE AND OBJECTIONS TO OPPOSER'S FIRST SET OF INTERROGATORIES TO APPLICANT IBRAHIM DABES

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Ibrahim Dabes DBA Dabes Egyptian Imports ("Applicant") makes the following Answers and Objections to the First Set of Interrogatories served by Mya Saray, LLC ("Opposer") on January 20, 2015:

GENERAL OBJECTIONS

The following General Objections are applicable to and are expressly made part of each Answer to the Rirst Set of Interrogatories:

- 1. Applicant objects to all instructions, definitions of terms, and specific instructions and definitions set forth in the First Set of Interrogatories to the extent that they seek to change the ordinary and accepted meaning of words and/or seek to change the meanings of word as they are used in the Trademark Trial and Appeal Board Manual of Procedure, the Trademark Manual of Examining Procedure and/or the Federal Rules of Civil Procedure.
- 2. Applicant objects to each of the Interrogatories to the extent that they contain multiple questions and/or subparts which are not properly numbered.

- 3. Applicant objects to each of the Interrogatories to the extent that they seek information and/or documents that are beyond the scope of the subject matter of the pending Proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence.
- 4. Applicant objects to each of the Interrogatories to the extent that they are overbroad, vague, ambiguous and/or unduly burdensome, particularly with respect to information and/or documents that are unrelated to the subject of the pending Proceeding, namely, US Trademark Application No. 86/025,182 "AMY GOLD TOBACCO MOLASSES (design)," and/or not reasonably calculated to lead to the discovery of admissible evidence.
- 5. Applicant objects to each of the Interrogatories to the extent that they seek information and/or documents that concerns Applicant's business outside the United States, which is unrelated to the subject of the pending Proceeding, namely, US Trademark Application No. 86/025,182 "AMY GOLD TOBACCO MOLASSES (design)," and/or not reasonably calculated to lead to the discovery of admissible evidence.
- 6. Applicant objects to each of the Interrogatories to the extent that they seek information that is protected from discovery by the attorney-client privilege, the work product doctrine or any other applicable privilege or immunity.
- 7. Applicant's Answers to the Interrogatories are limited to Applicant's knowledge at the present time. Accordingly, Applicant reserves the right to supplement its Answers as it may deem appropriate.

INTERROGATORIES

INTERROGATORY NO. 1. Explain why (including the inspiration, significance, and meaning) Defendant selected the designation "AMY" as a brand for Defendant Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY GOLD TOBACCO MOLASSES (design) because AMY is the name of Applicant's daughter.

INTERROGATORY NO. 2. Explain the rationale for adopting the designation "AMY" in connection with Defendant's Products and why "AMY" was selected over alternative designations, with specific reference to those designations.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY GOLD TOBACCO MOLASSES (design) because AMY is the name of Applicant's daughter.

INTERROGATORY NO. 3. If Defendant utilizes alternative brand designations in connection with Defendant Products, identify such alternative brand designations by its literal elements (e.g. words) and design elements (e.g., illustrated components).

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 4. Explain other inspiration and meaning of the alternative brand designations responsive to INTERROGATORY NO. 3 how the Products for such other alternative brand designations relate to Defendant Products sold under the AMY Brand with specific reference to Defendant Product quality, Defendant Product quantity (generally at this time), Defendant Product manufacturing source, the characteristics of prospective purchasers of the Defendant Products, and other significant criteria.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 5. Identify the manufacturing source of the Defendant Products under the AMY Brand, (i) if manufactured by a third party, by name and location, and (ii) if manufactured by Defendant, by address and manager of factory?

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 6 Describe the importation of Defendant's Products into the United States with specific reference to the:

- a. identities of customs brokers, warehousing, transport and shipping parties, handlers, and delivery agents;
- b. dates of importation, by arrival into the United States;
- c. quantities of Products divided into categories thereof (e.g., hookahs, hookah tobacco, etc.)

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 7. Identify each Distributor and Retailer known to Defendant authorized to sell Defendant Products in the United States. For each Distributor, include the geographic area, if any, to which the Distributor is permitted to distribute. (To the extent that the answer to this questions calls for the identification of more than 20 retailers, then Defendant need only list the 20 highest volume retailers)

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

INTERROGATORY NO. 8. Identify each hookah sold under the AMY Brand (including all internal names, code names, marketing names, and any other unique designations) and each hookah's date of first sale anywhere in the world, and its date of first sale under the AMY Brand, if different.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Applicant objects to the portions of this interrogatory that relate to goods sold outside the US. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 9. Identify the average distribution price and manufacture's suggested retail price, if any, of each hookah of INTERROGATORY NO. 8.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. In addition, Applicant objects to the portions of this interrogatory that relate to goods sold outside the US. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 10. Identify the sales quantity in the United States of each hookah of INTERROGATORY NO. 8 by year.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject

matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 11. Did you consider the affects of using the name AMY on Defendant Products notwithstanding Plaintiff's use of MYA with Plaintiff Products, and if so, what factors did you consider to be related to dispelling confusion?

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY GOLD TOBACCO MOLASSES (design) because AMY is the name of Applicant's daughter. Never gave any consideration to MYA as it is completely different and not confusing with regards to Applicant's use of the mark AMY GOLD TOBACCO MOLASSES (design).

INTERROGATORY NO. 12. Describe the extent to which Defendant searched for marks that might impede the use or registration of any AMY Brand for Defendant Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds that it seeks information that is irrelevant, privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The application is based on German Registration No. 302012000345 under Section 44(e) of the Trademark Act. It is Applicant's understanding that a search was conducted by the German Patent and Trade Mark Office before the foreign mark was registered. Additionally, the USPTO conducted a search which revealed that there were no registered or pending marks, including those allegedly owned by Opposer, that would bar registration of Applicant's mark.

INTERROGATORY NO. 13. Identify the individuals most knowledgeable about the advertising, marketing, and/or promotion of each hookah of INTERROGATORY NO. 8.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 14. Identify the individual most knowledgeable about the appearance and aesthetic properties of each hookah of INTERROGATORY NO. 8.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 15. Describe in detail the date and circumstances under which Defendant first learned of each of the MYA Trademarks, including but not limited to, the persons that became aware of each of the MYA Trademarks, and all steps and actions taken, with respect to the design, development, offer for sale, and sales of Defendant Products identified in response to INTERROGATORY NO. 8, including any efforts by Defendant to avoid confusion between MYA Trademarks and the AMY Brand.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: Applicant cannot recall an exact date; however, on or about September 13, 2013 Applicant's attorney responded to a cease and desist letter from Opposer asserting there was no likelihood of confusion. See documents produced in response to Opposer's First Set of Requests for Production. No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 16. Identify each and every person with knowledge of any and all instances where Defendant received mail, orders, deliveries, telephone calls, bill, payments, invoices, or any other communications referring to or inquiring about either Plaintiff or the MYA Trademarks.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: On or about September 13, 2013 Applicant's attorney responded to a cease and desist letter from Opposer asserting there was no likelihood of confusion. The undersigned received a notice from the Trademark Trial and Appeal Board of the Notice of Opposition filed against the subject application via email on September 10, 2014.

INTERROGATORY NO. 17. Identify all trade shows attended by Defendant, including name of trade show, date, and location, within the past four (4) years in which Defendant marketed Defendant Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: Applicant attended the TPC 2014 trade show in Las Vegas, Nevada 29.01-30.01.2014.

INTERROGATORY NO. 18. Identify each and every person with knowledge of any and all instances where Defendant obtained any knowledge or information regarding any confusion whatsoever on the part of any person about the source, affiliation, or sponsoring of any of Plaintiff Product and the source, affiliation, or sponsoring of Defendant Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

INTERROGATORY NO. 19. State in detail all facts upon which Defendant bases its denial of likelihood of confusion of any of the MYA Trademarks and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and thins relating to any such facts, including information that refutes Defendant's denial.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The marks are dissimilar in appearance, sound, connotation, commercial impression and any other factors which could have a bearing on the fact of no likelihood confusion in the marketplace. Trademark Examining Attorney assigned to the subject registration concluded on November 21, 2013 that there were no registered or pending marks, including those allegedly owned by Opposer, that would bar registration of Applicant's mark. Simply because the respective marks have three letters in common does not mean that confusion, mistake or deception as to the source of the products is likely. Additionally, Applicant's mark includes the additional terms "GOLD TOBACCO MOLASSES" and the respective design elements that further preclude any likelihood of confusion.

INTERROGATORY NO. 20 State in detail all facts upon which Defendant bases any defense raised by Defendant in this action and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and things relating to any such facts, including information that refutes Defendant's denial.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The marks are dissimilar in appearance, sound, connotation, commercial impression and any other factors which could have a bearing on the fact of no likelihood confusion in the marketplace. Trademark Examining Attorney assigned to the subject registration concluded on November 21, 2013 that there were no

registered or pending marks, including those allegedly owned by Opposer, that would bar registration of Applicant's mark. Simply because the respective marks have three letters in common does not mean that confusion, mistake or deception as to the source of the products is likely. Additionally, Applicant's mark includes the additional terms "GOLD TOBACCO MOLASSES" and the respective design elements that further preclude any likelihood of confusion.

INTERROGATORY NO. 21. State the exact date(s) on which Defendant will rely as to when its use of the AMY Logo commenced in connection with the sale or distribution of each constituent (e.g., cigarettes) of the Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 22. Identify all documents, purchase orders, invoices, labels, flyers, brochures, other advertising or any writing whatsoever that Defendant will rely upon to establish the date(s) specified in answer to INTERROGATORY NO. 21.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 23. With respect to the first use(s) of the marks of the AMY Logo in connection with the sale of each product and/or service identified in above INTERROGATORY NO. 21, state:

(a) Each manner in which the applied---for designation was used, e.g. by affixing to containers, labels, or in newspaper advertising or fliers;

- (b) If the applied---for designation was printed on containers for the product or on labels, the name and address of the person(s) or organization(s) which printed them;
- (c) If the applied---for designation was used in brochures or fliers, the name and address of the person(s) or organization(s) which printed them;
- (d) If the applied---for designation was used in media advertising, the name and address of the person(s) or organization(s) which advertised them;
- (e) Whether the product and/or service was sold;
- (f) Whether the product and/or service was offered free of charge;
- (g) The name and address of the person(s) or organization(s) to whom the product and/or service was sold; and
- (h) Whether the sale of each product under the applied—for designation has been continuous from each date specified in above INTERROGATORY NO. 21 to the present.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark, nor given away for free.

INTERROGATORY NO. 24. Describe and identify the channels of trade in the United States of each Product.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 25. Identify each item of sales literature, including brochures and fliers produced by or for Applicant for distribution in the United States to advertise each of the Products.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

INTERROGATORY NO. 26. List all geographic areas (by city and state) in which Applicant sells each of the Products.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 27. List all other media, not already identified, where Applicant has advertised each of the Products, state the amount expended by Defendant in the United States in the advertisement of each Product.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No advertising in other media and no expenditures.

INTERROGATORY NO. 28. For each calendar year since commencement of use the AMY Brand or applied-for-designation in connection with the sale of each of the Products, state the amount of sales by Defendant in the United States of each of the Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 29. Identify the Defendant's predecessors-in-interest, and all of its subsidiaries and affiliated companies, and the officers, directors, employees, agents and representatives thereof.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

INTERROGATORY NO. 30. Identify all persons, businesses, and entities involved in the proliferation of each Subject Hookah categorized by each Subject Hookah and by the following stages of development:

- a. the creation of each Subject Hookah, including its conception;
- b. the design of each Subject Hookah;
- c. the development of each Subject Hookah;
- d. the production of each Subject Hookah;
- e. the manufacture of each Subject Hookah, including quantities manufactured for Defendant;
- f. the transfer of each Subject Hookah to any property owned, leased, controlled, or accessed for commercial purposes by the Defendant; and
- g. the marketing and advertisement of each Subject Hookah.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections,

Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 31 Identify each source, quantity, and dollar amount of each Subject Hookah sold by Defendant in the United States arranged with reference to each Subject Hookah and each transaction.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 32 Identify each commercial purchaser, the total quantity, and total dollar amount of each Subject Hookah vended by Defendant in the United States, arranged with reference to each Subject Hookah and commercial purchaser (together with a single "catch---all" category titled "direct consumer purchases").

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 33. Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as AMY-018 and the Econo-MYA QT depicted in Exhibit 4.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding, particularly as it seeks the comparison of disparate objects for no purpose. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as

follows: Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 34. Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as Jinn and the MYA QT depicted in Exhibit 5.

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding, particularly as it seeks the comparison of disparate objects for no purpose. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark.

INTERROGATORY NO. 35. Identify any and all documents responsive to the foregoing interrogatories or other Document Request issued by Plaintiff in this action which are lost or unavailable and identify the date(s) the loss or unavailability was first discovered, the person(s) who first discovered the loss or unavailability and the person(s) most knowledgeable about the contents of such lost or unavailable documents.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

INTERROGATORY NO. 36. Identify all persons who participated in any way in the preparation of the answers or responses to these interrogatories and state specifically, with reference to interrogatory numbers, the area of participation of each such person (excluding only Applicant's lawyers or their representatives).

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it seeks information which is privileged and/or attorney work product.

Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The persons who provided information are Mr. Ibrahim Dabes and Mrs. Larissa Stempfle.

INTERROGATORY NO. 37. Identify any study, research, focus group, testing or similar validation procedure employed by Defendant or any person or entity at Defendant's requestor on behalf of Defendant to determine the presence and/or absence of any confusion between Plaintiff's Products and the Defendant's Products when offered under the applied---for designations or AMY Brand generally.

ANSWER: In addition to the general objections above, Applicant objects to this Interrogatory on the grounds that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Additionally, Applicant objects to this Interrogatory on the grounds that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

Date: March 26, 2015

Respectfully submitted,

/Paul D. Bianco/ Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 East Dixie Highway, Suite 115 Miami, Florida 33180

Ph: 305 830-2600 Fax: 305 830-2605

Email: <u>tmmiami@fggbb.com</u>

Attorneys for Applicant Dabes, Ibrahim

CERTIFICATE OF SERVICE

It is hereby certified that a copy of this RESPONSE AND OBJECTIONS TO OPPOSER'S FIRST SET OF INTERROGATORIES TO APPLICANT IBRAHIM DABES was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Opposer, on this 26th day of March 2015.

/Paul D. Bianco/ Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application No. 86/025 182

For the Mark: AMY GOLD T Published in the <i>Official Gaze</i>	COBACCO MOLASS	SES (design)
Mya Saray, LLC,)	
Oppose	er,	Opposition No.: 91218280
v.)	
Dabes, Ibrahim DBA)	
Dabes Egyptian Imports,)	
Applica	ant.)	
	_	

RESPONSE AND OBJECTIONS TO OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION TO APPLICANT IBRAHIM DABES

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Ibrahim Dabes DBA Dabes Egyptian Imports ("Applicant") makes the following Answers and Objections to the First Set of Requests for Production served by Mya Saray, LLC ("Opposer") on January 20, 2015:

GENERAL OBJECTIONS

The following General Objections are applicable to and are expressly made part of each Answer to the First Set of Requests for Production:

- 1. Applicant objects to all definitions, specific definitions and instructions set forth in the First Set of Requests for Production to the extent that they seek to change the ordinary and accepted meaning of words and/or seek to change the meanings of word as they are used in the Trademark Trial and Appeal Board Manual of Procedure, the Trademark Manual of Examining Procedure and/or the Federal Rules of Civil Procedure.
- 2. Applicant objects to each of the Requests for Production to the extent that they contain multiple questions and/or subparts which are not properly numbered.

- 3. Applicant objects to each of the Requests for Production to the extent that they seek information and/or documents that are beyond the scope of the subject matter of the pending Proceeding and/or not reasonably calculated to lead to the discovery of admissible evidence.
- 4. Applicant objects to each of the Requests for Production to the extent that they are overbroad, vague, ambiguous and/or unduly burdensome, particularly with respect to information and/or documents that are unrelated to the subject of the pending Proceeding, namely, US Trademark Application No. 86/025,182 "AMY GOLD TOBACCO MOLASSES (design)," and/or not reasonably calculated to lead to the discovery of admissible evidence.
- 5. Applicant objects to each of the Requests for Production to the extent that they seek information and/or documents that concerns Applicant's business outside the United States, which is unrelated to the subject of the pending Proceeding, namely, US Trademark Application No. 86/025,182 "AMY GOLD TOBACCO MOLASSES (design)," and/or not reasonably calculated to lead to the discovery of admissible evidence.
- 6. Applicant objects to each of the Requests for Production to the extent that they seek information that is protected from discovery by the attorney-client privilege, the work product doctrine or any other applicable privilege or immunity.
- 7. Applicant's Answers to the Requests for Production are limited to Applicant's knowledge at the present time. Accordingly, Applicant reserves the right to supplement its Answers as it may deem appropriate.

REQUESTS

REQUEST NO. 1: All documents that are identified in, or should have been identified in, or concern or relate to your answers to Plaintiff's First Set of Interrogatories to Defendant Dabes, including but not limited to, any documents you used or referred to in answering the Interrogatories.

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith.

REQUEST NO. 2: All licenses or other documents provided to you constituting permission from a government entity or subdivision – federal, state or local – to perform acts in commerce, including those related to buying/selling of tobacco and related products, permissions for importation of goods, zoning variances, etc.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 3: All documents that reflect or reference a sale of any Subject Hookah to any Distributor in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 4: All documents that reflect or reference a sale of any Subject Hookah to any Retailer in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Reguest as follows: None.

REQUEST NO. 5: All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Distributor in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the

pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: For documents that show sales to distributors for goods marked with the AMY DELUXE (design) mark, see documents attached to Request No. 1.

REQUEST NO. 6: All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Retailer in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 7: All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Distributor in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 8: All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Retailer in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 9: A physical specimen of each Subject Hookah.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the

pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: No document requested. For photographs that show goods marked with the AMY DELUXE (DESIGN) mark, see documents attached to Request No. 1

REQUEST NO. 10: All documents and things that relate or refer to, or describe Defendant's inventory of hookah products physically located in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 11: All documents that relate or refer to, or describe, the locations for physical storage or warehousing of Defendant Products or packaging for Defendant Products in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 12: All documents that relate or refer to, or result from, the Defendant's importation of Defendant Products into the United States since the adoption of the AMY Brand or commercialization of the Subject Hookahs (whichever is earlier). This will include correspondence, invoices, and any other documents from manufacturers, importers, freight forwarders, customs agents, and others involved in the importation process.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 13: All documents and things that refer or relate to the purchase or ordering of packaging with the AMY Logo or AMY Brand.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 14: All documents and things that refer or relate to the creation, design, and appearance of the Subject Hookahs, including the creation design and appearance of alternatives.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 15: All documents and things that refer or relate to the creation, design, and appearance of the AMY Logo, including the creation design and appearance of alternatives.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 16: All documents and things that refer or relate to the creation, design, and appearance of the AMY Brand, including the creation design and appearance of alternatives.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the

pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 17: All documents and things relating or referring to design differences between the Subject Hookahs and any Plaintiff hookah.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 18: All documents and things that refer or relate to communications between the Defendant and between any person involved in the design, production, shipping, or storage of the Subject Hookahs.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 19: All documents and things that refer or relate to any complaint from any consumer Retailer, or Distributor regarding any Subject Hookah or Defendant Product bearing the AMY Logo or AMY Brand.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 20: All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 21: All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 22: All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs in the United States.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 23: All invoices, media, schematics, proofs, drafts, and other documents related to the creation of the AMY Logo or the AMY Brand, including any trademark clearance opinions or contracts with third party branding consultants.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on

the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 24: All documents characterizing any belief by a third party that a MYA Product or a Defendant Product are from a common source (including, believing a MYA Product to be a Defendant Product, vice versa, believing that Plaintiff and Defendant share a common manufacturing source, etc.).

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 25: All documents characterizing a design of a MYA Product or MYA Trademark.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 26: All documents and things related to the ability of a Retailer or Distributor or end---user to order the Subject Hookahs and Defendant Products (e.g., catalogues, product specifications, etc.).

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 27: All documents and things that refer or relate to the submission, review, clearance, rejection, approval, or registration with any governmental agency or supplier of any aspect of the Subject Hookahs or the AMY Brand or AMY Logo.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 28: All documents and things that refer or relate to the costs of manufacturing, acquiring parts and materials for, and Defendant's purchase (if any) of the Subject Hookahs.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1.

REQUEST NO. 29: All documents and things relating to visits and communications to any store, retail outlet, or other business engaged in the sale of Defendant Products in the United States visited by any employee, representative, agent, official, executive and/or director of the Defendant for purposes relating to creating or continuing sales of Defendant Products.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 30: All Documents and things that describe, illustrate, or depict your corporate or organizational structure, or any group assignment, including, but not limited to, organizational charts.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 31: Documents and things concerning your document retention policies.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 32: All documents constituting or concerning reports prepared by any expert whom you expect to call at trial, including draft reports.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows; None.

REQUEST NO. 33: All documents provided by you to any expert witness retained by you for this action.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 34: Any and all statements taken of any person regarding any aspect of Plaintiff's claims or the allegations in this action or any defense to those claims or allegations.

ANSWER: In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 35: All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your First Affirmative Defense (Failure to State a Claim).

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 36: All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Second Affirmative Defense (Absence of Likelihood of Confusion).

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith.

REQUEST NO. 37: All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Third Affirmative Defense (Lack of Damages).

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None.

REQUEST NO. 38: All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Fourth Affirmative Defense (Estoppel).

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith.

REQUEST NO. 39: All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Fifth Affirmative Defense (Laches).

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith.

REQUEST NO. 40: All documents that relate to reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Sixth Affirmative Defense (Acquiescence).

ANSWER: See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith.

Date: March 26, 2015

Respectfully submitted,

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 East Dixie Highway, Suite 115 Miami, Florida 33180

Ph: 305 830-2600 Fax: 305 830-2605

Email: tmmiami@fggbb.com

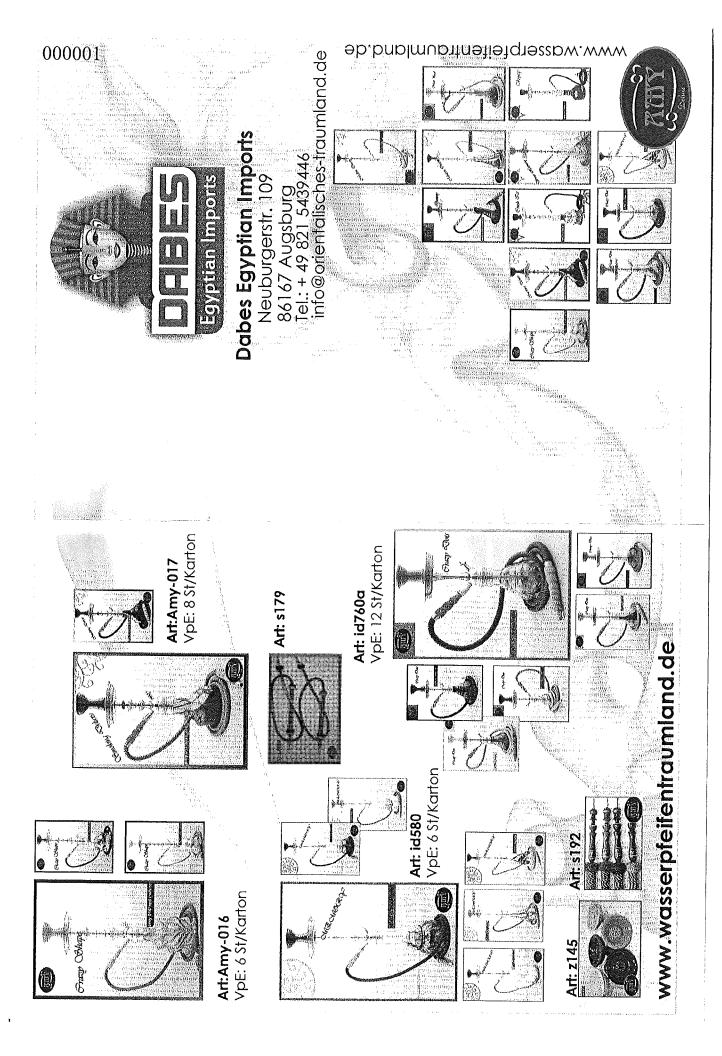
Attorneys for Applicant Dabes, Ibrahim

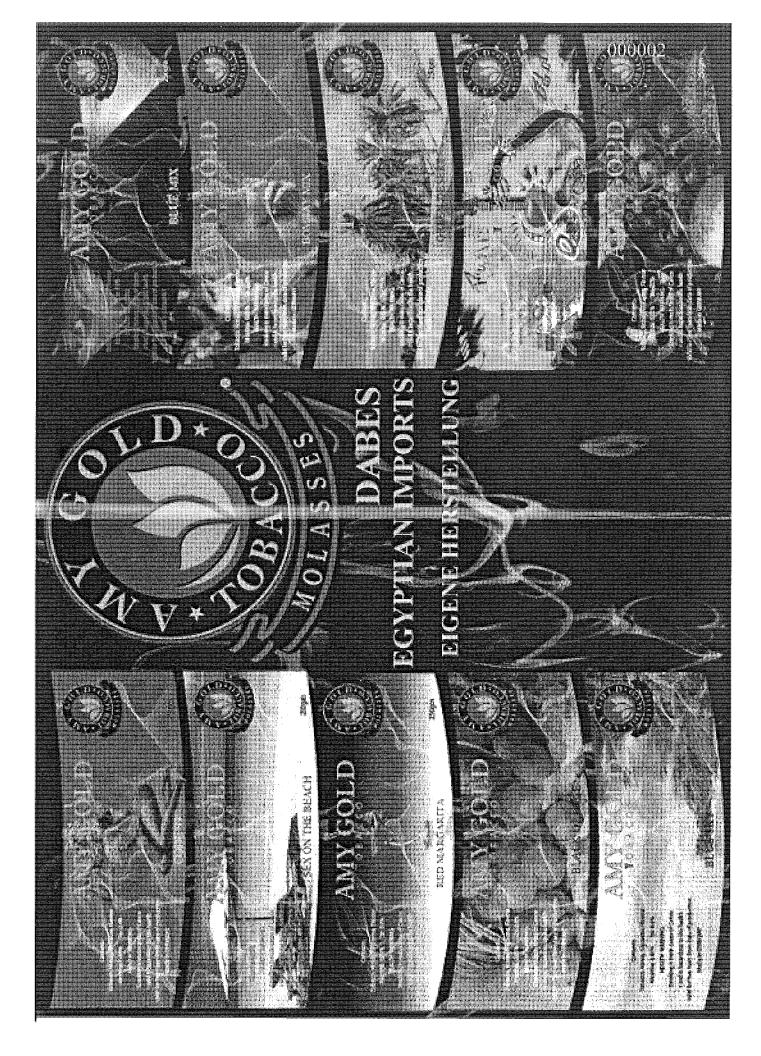
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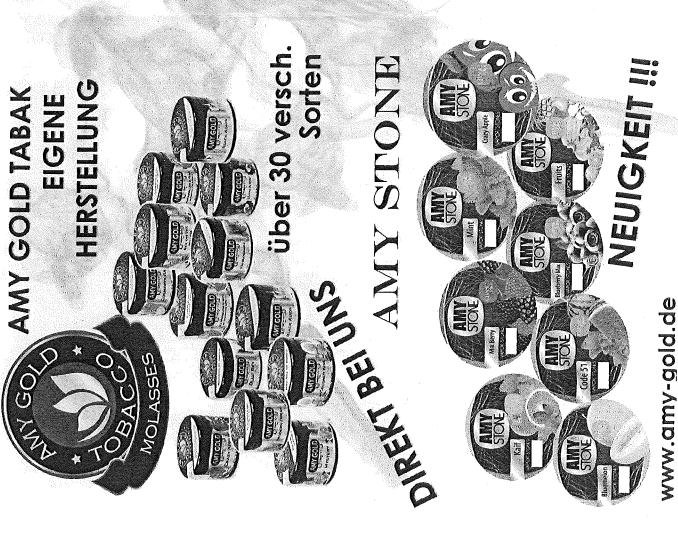
It is hereby certified that a copy of this RESPONSE AND OBJECTIONS TO OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION TO APPLICANT IBRAHIM DABES was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Opposer, on this 26th day of March 2015.

/Paul D. Bianco/ Paul D. Bianco

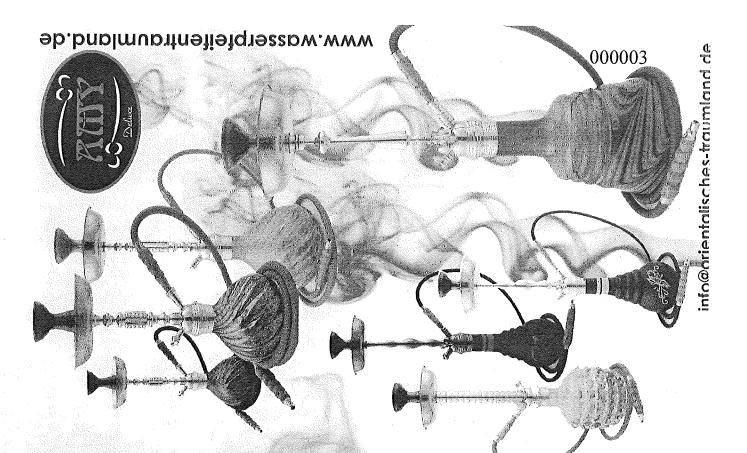
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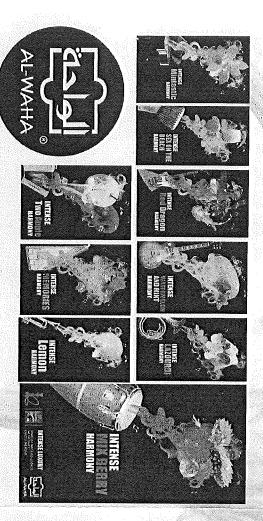


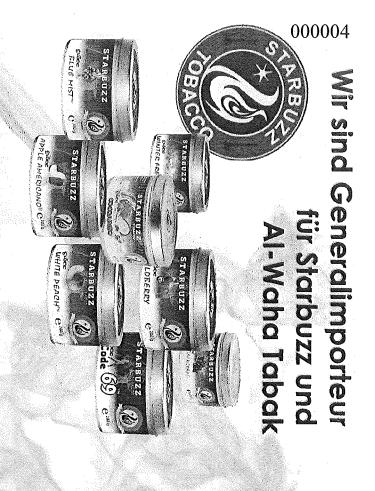


WIR STELLEN IHNEN UNSERE ABSOLUTEN NEUIGKEITEN VOR HALLE 8 STAND B12

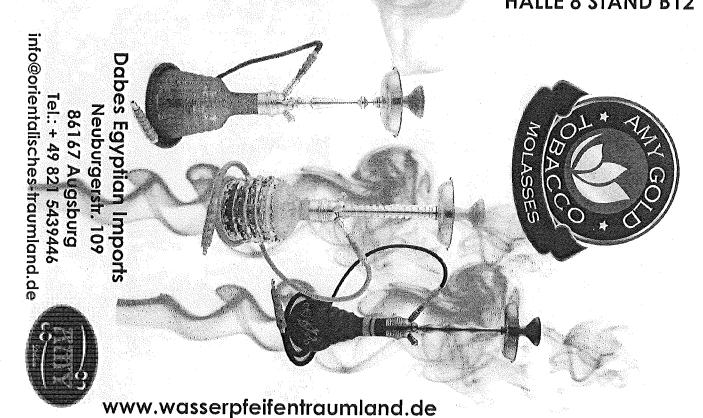


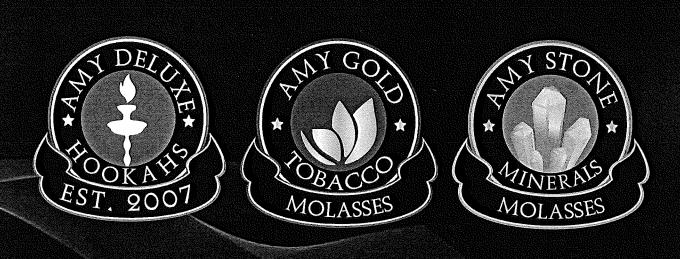
www.wasserpfeifentraumland.de



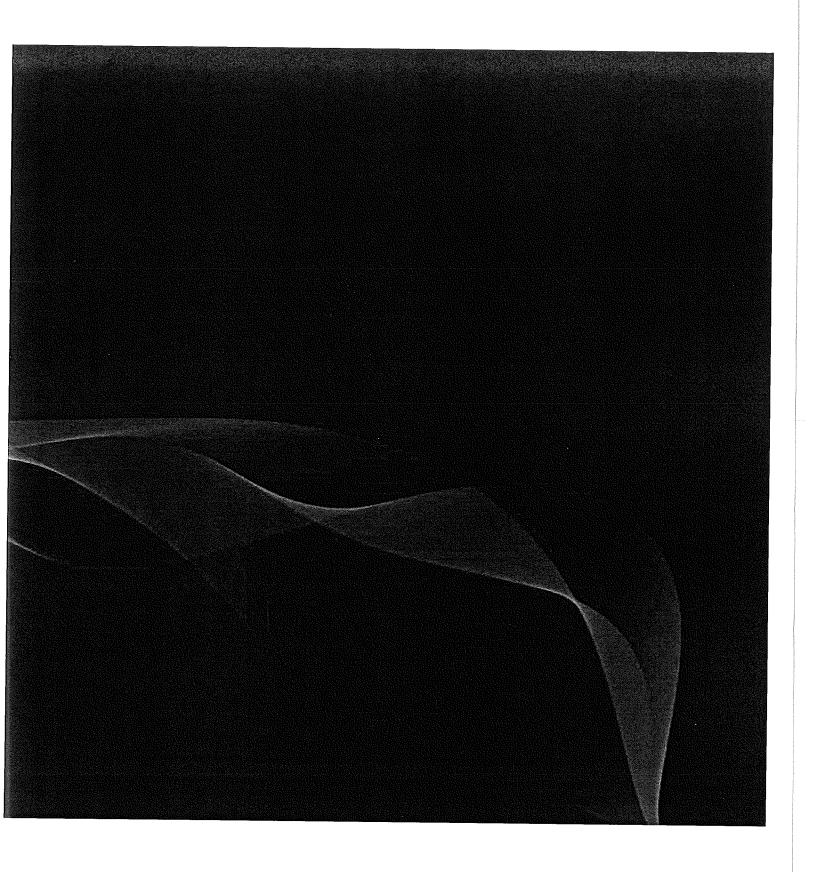


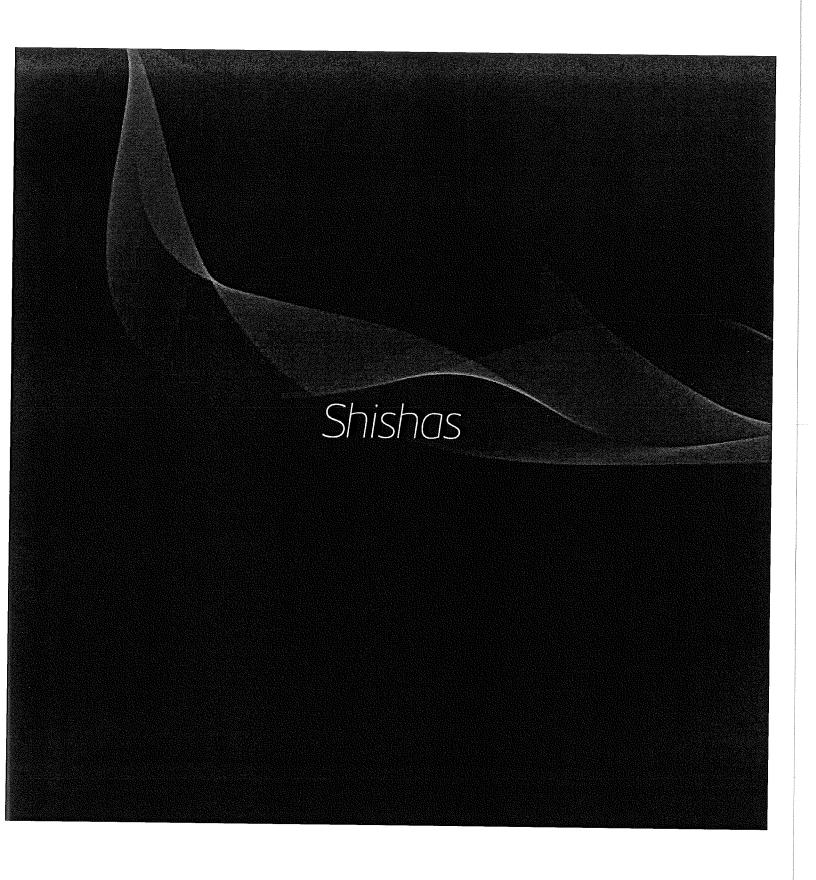
Bestellen Sie vor Ort und sichern Sie sich bei Wasserpfeifen und Zubehör einen Rabatt von 10 %.
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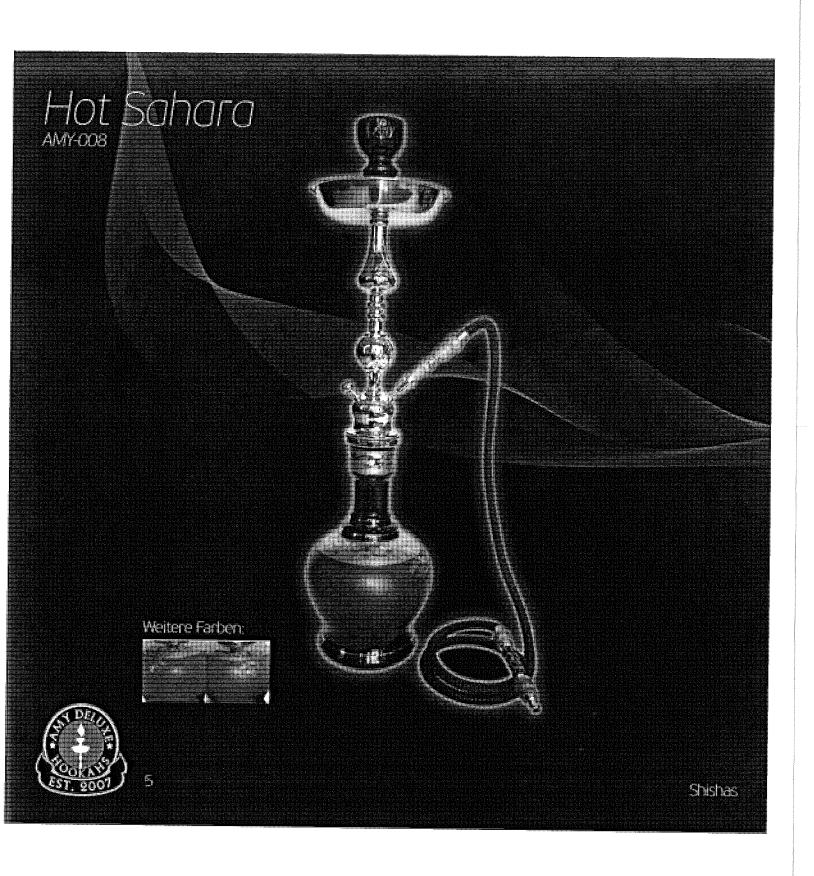


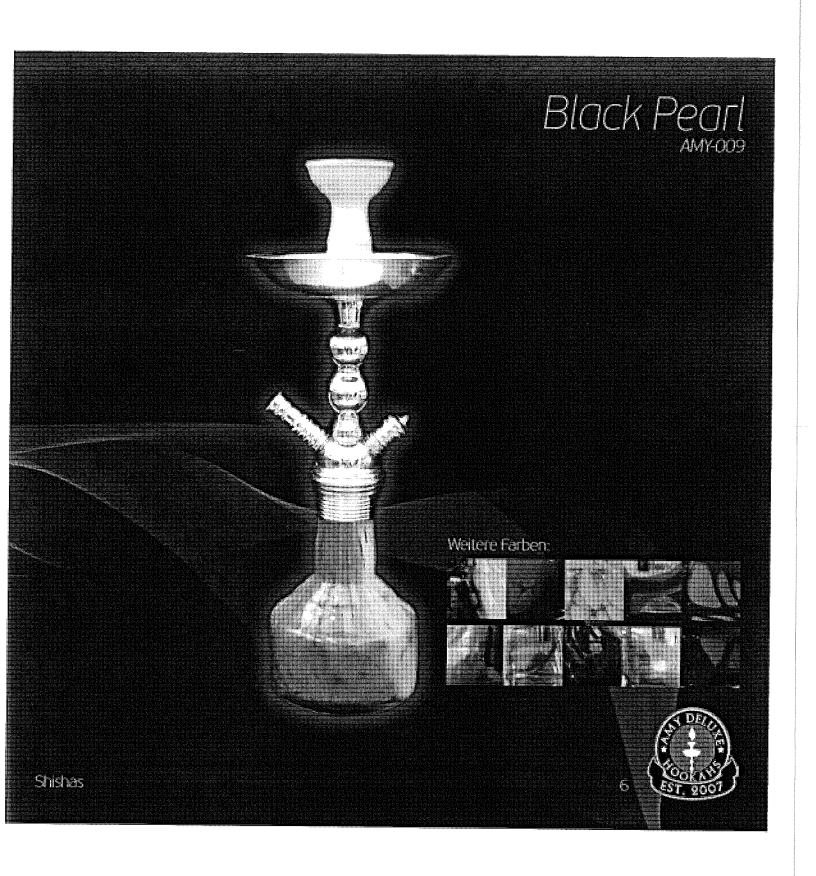
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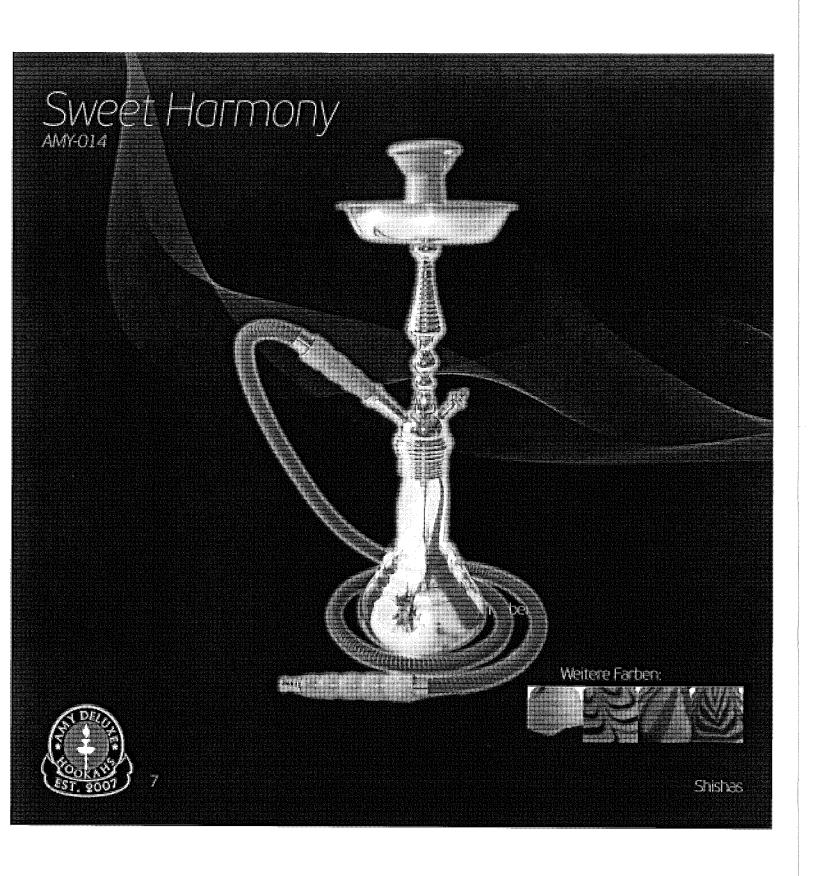


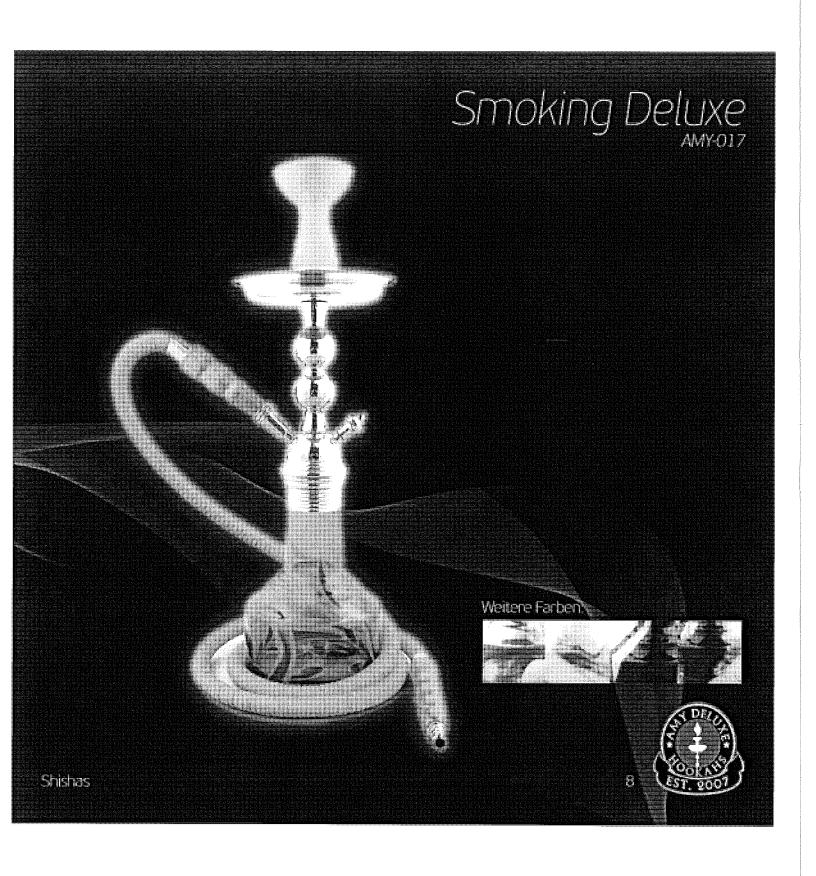


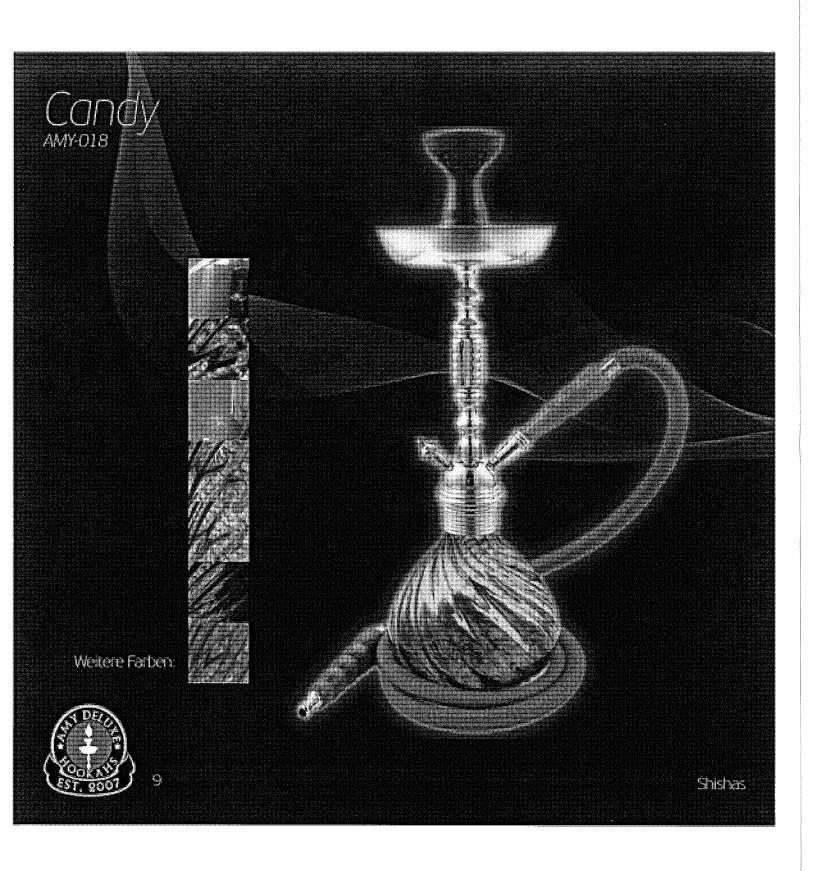


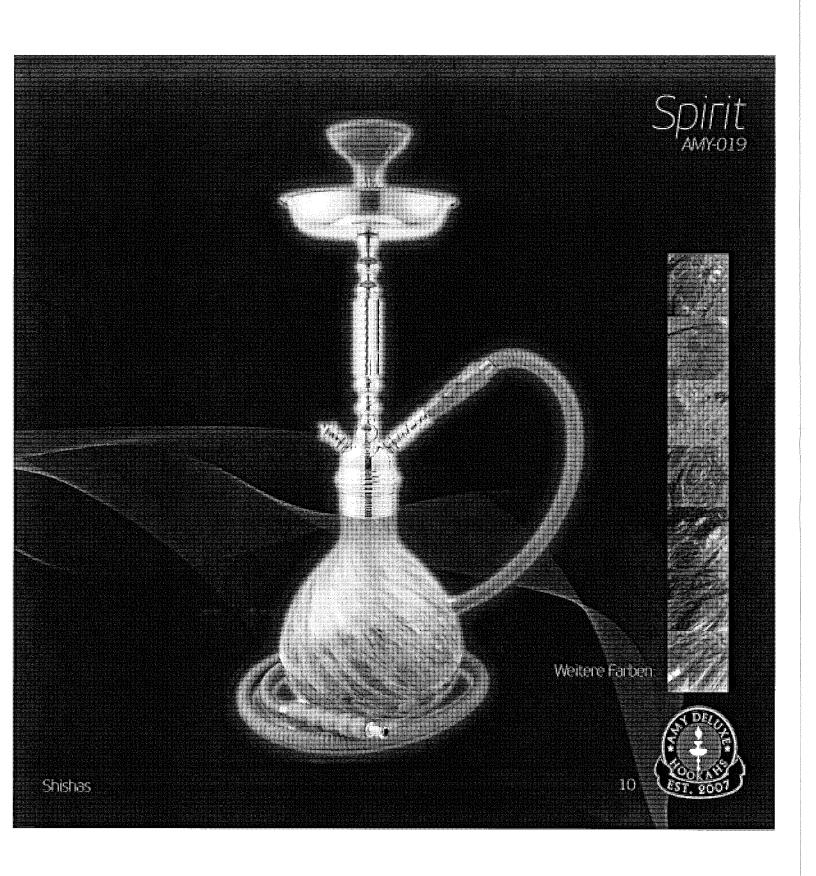


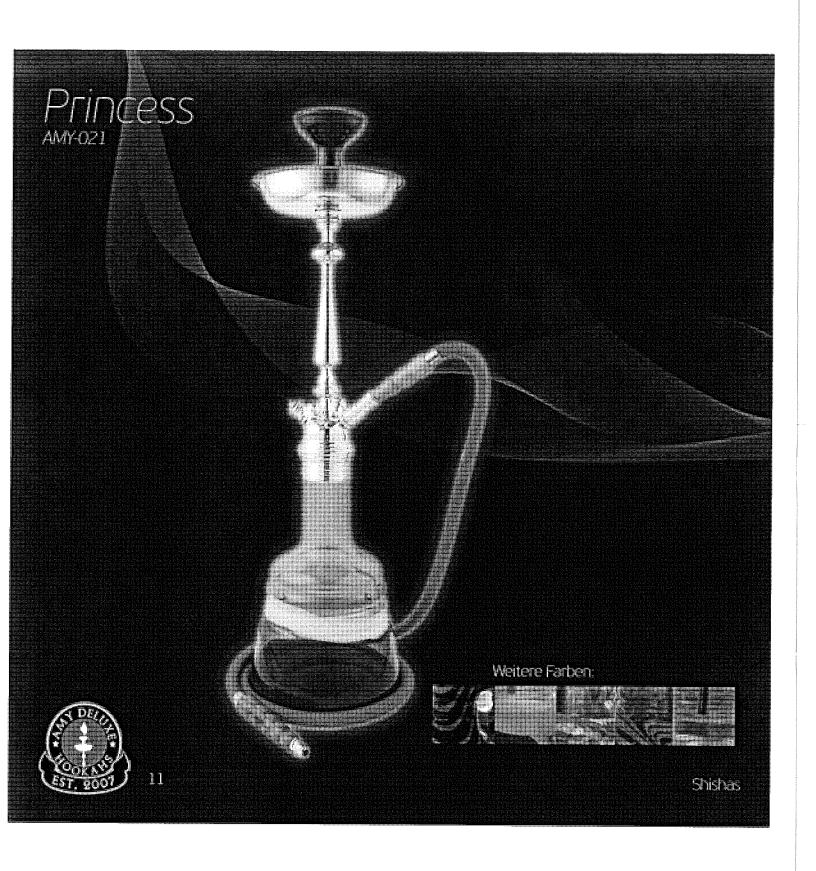




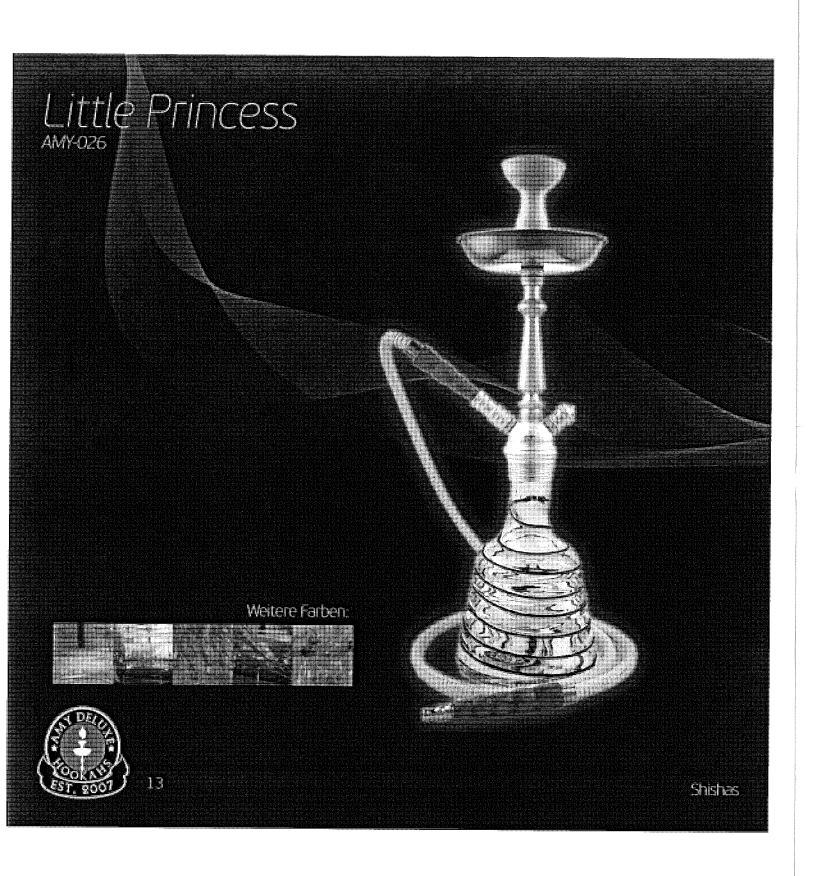


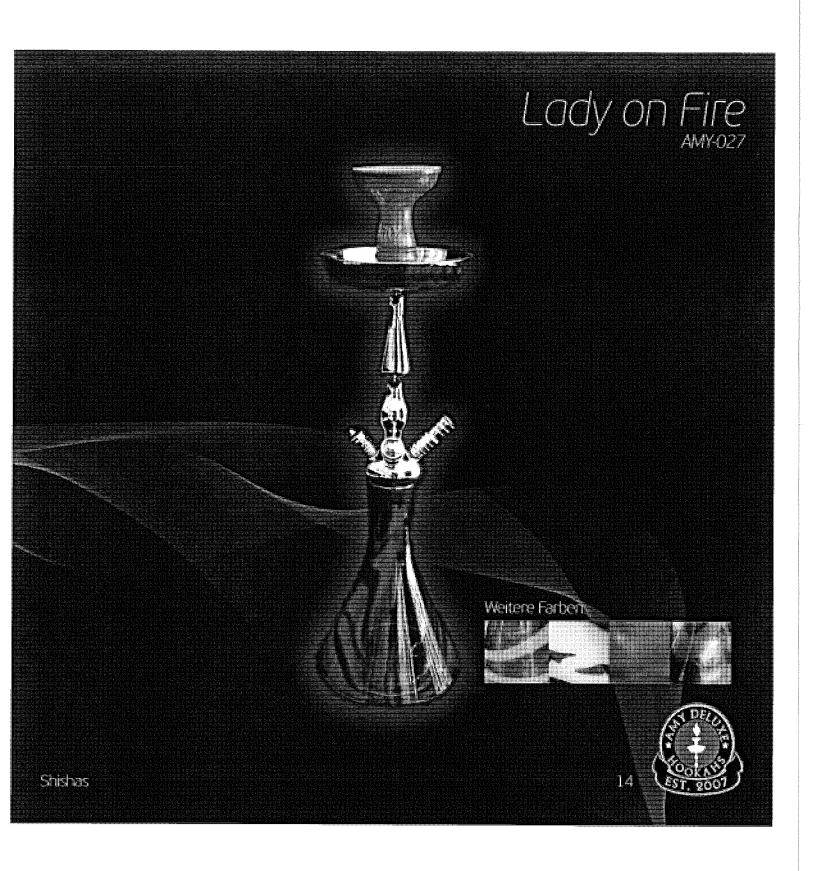


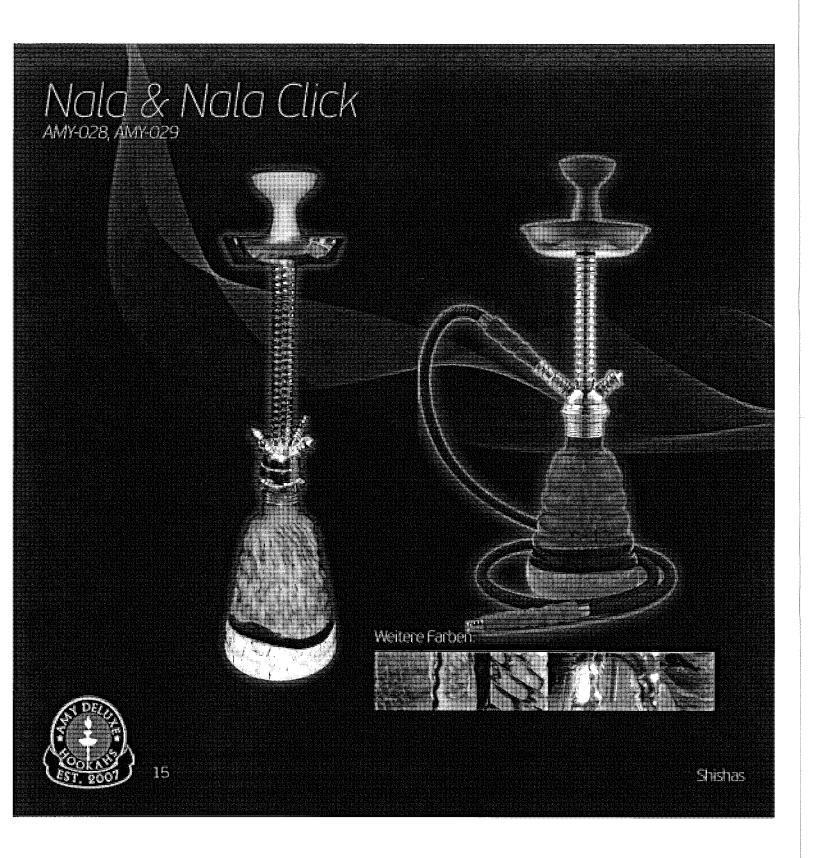


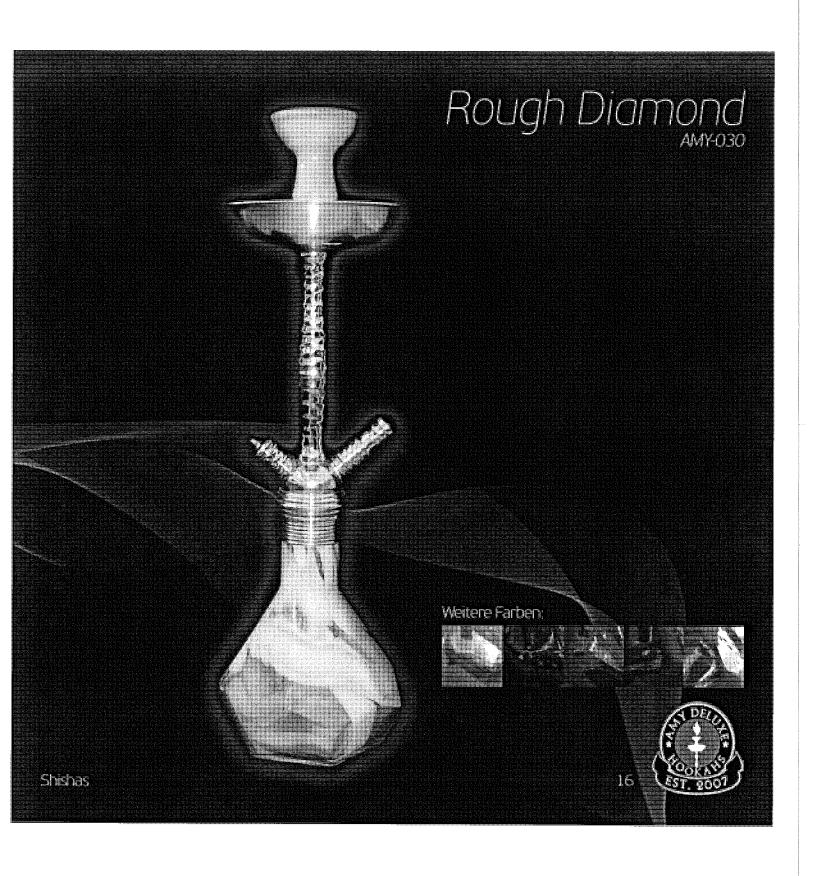


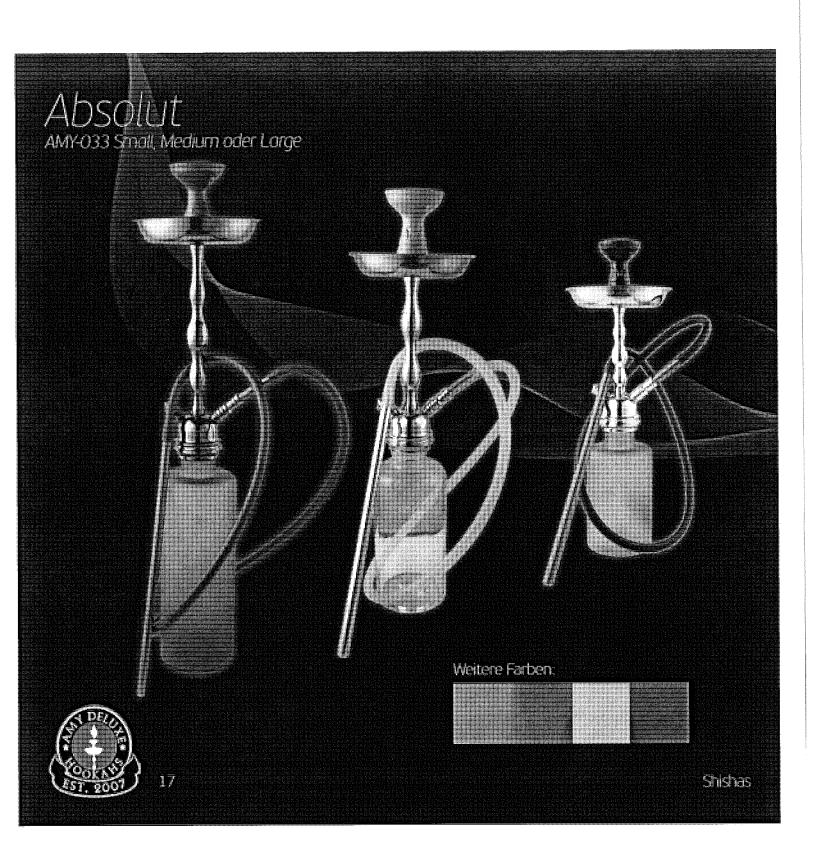


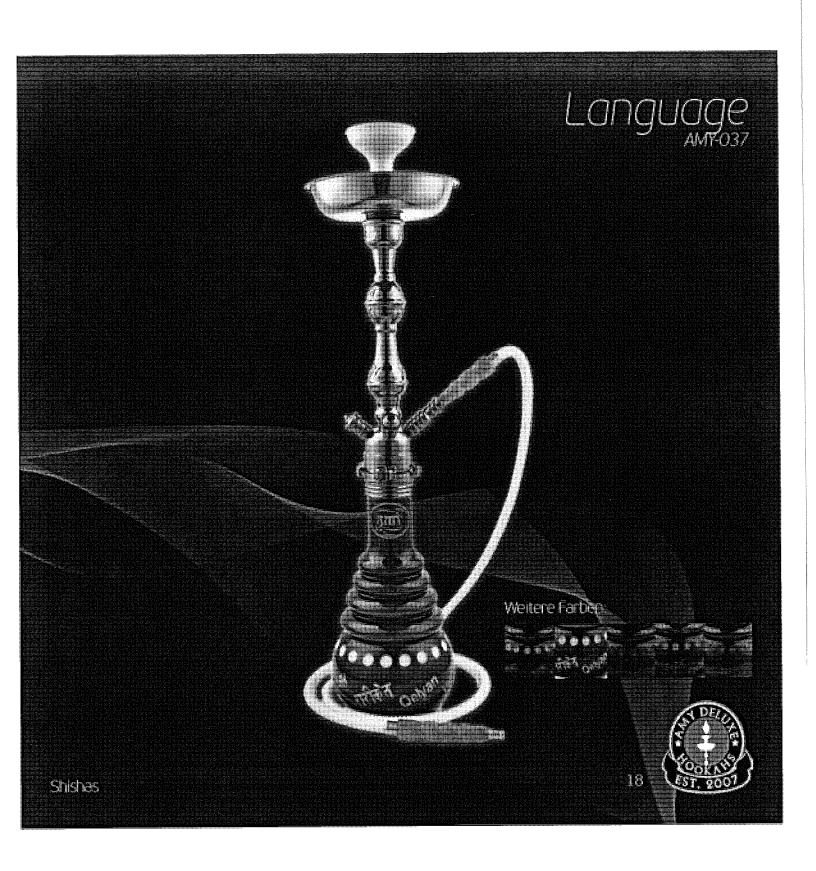


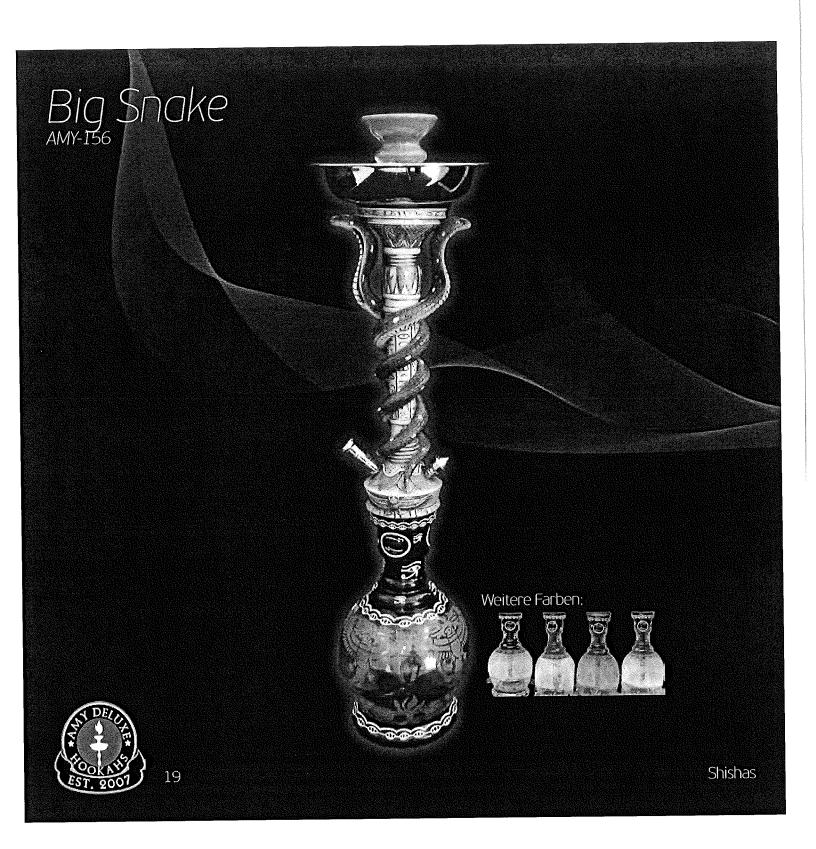


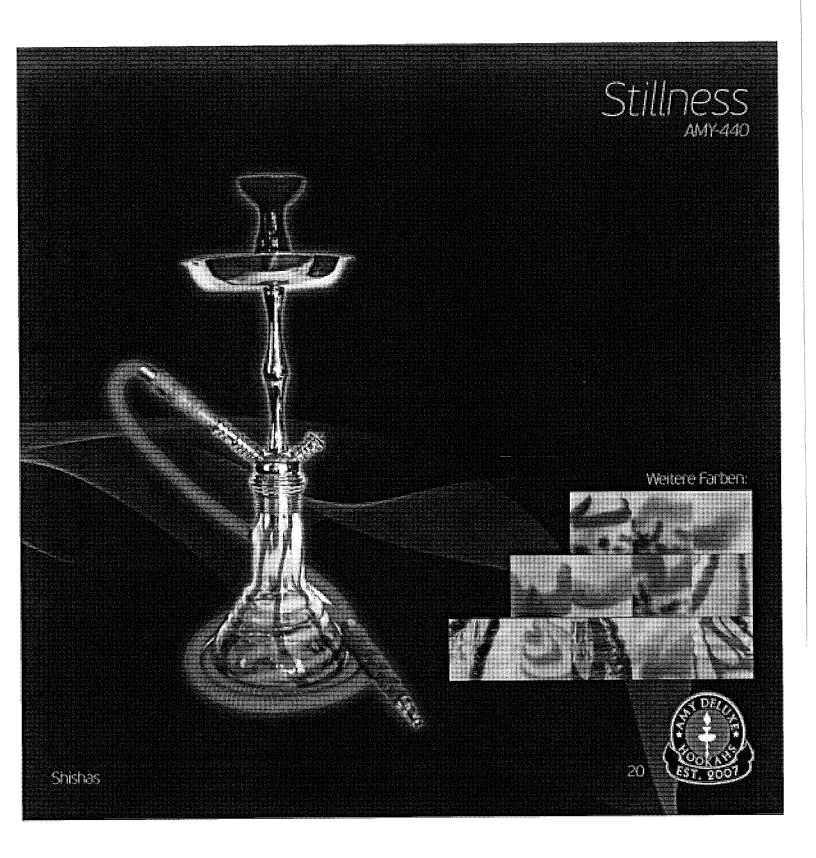


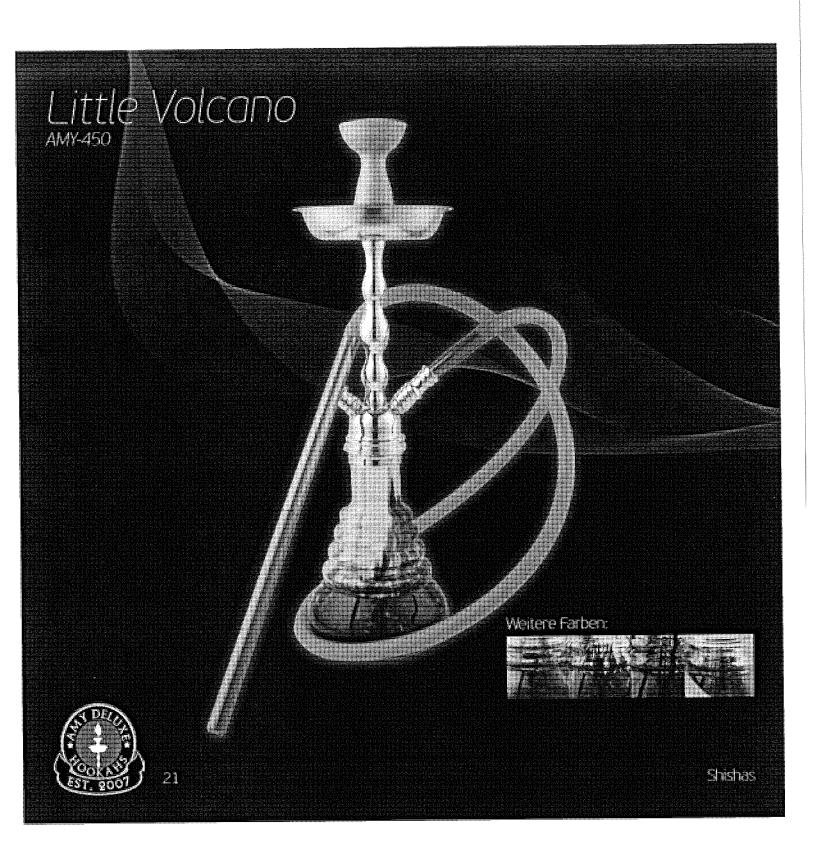


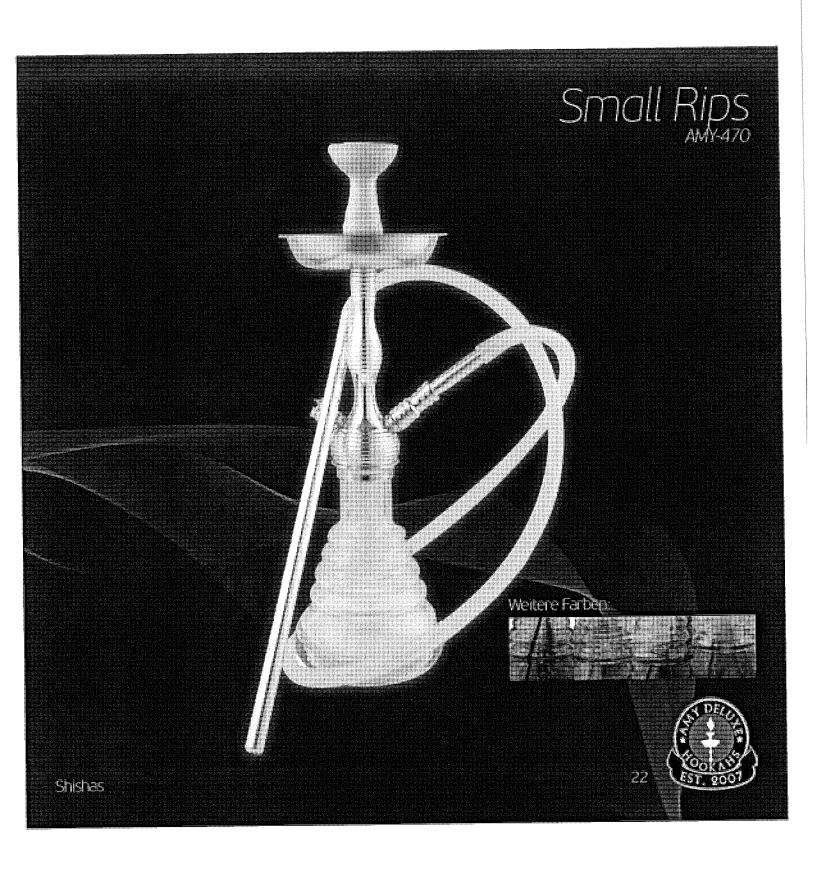


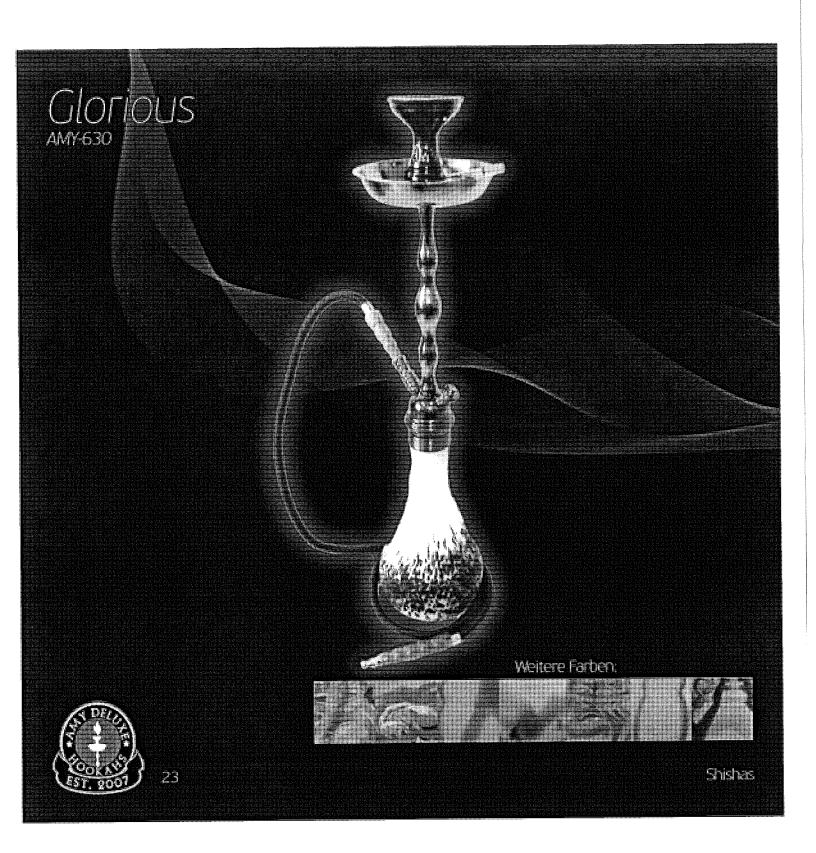


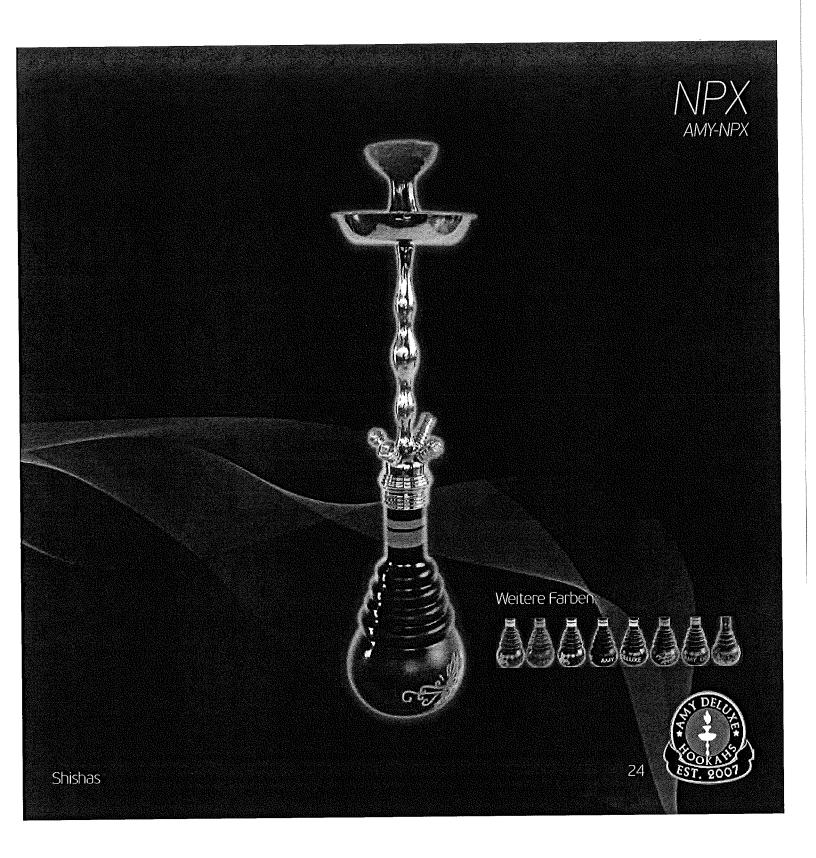


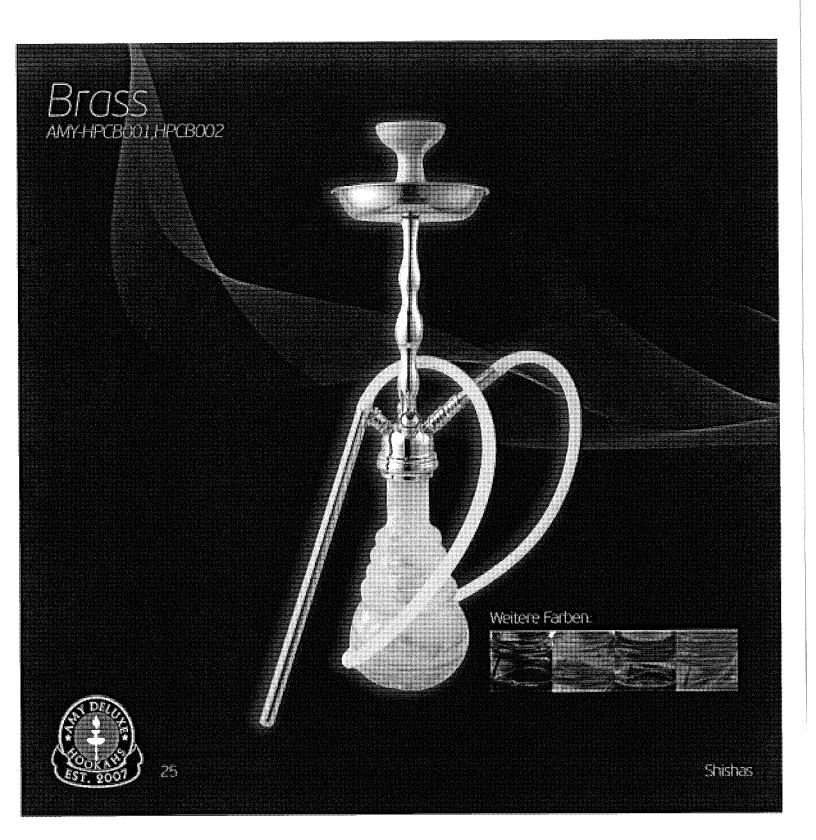


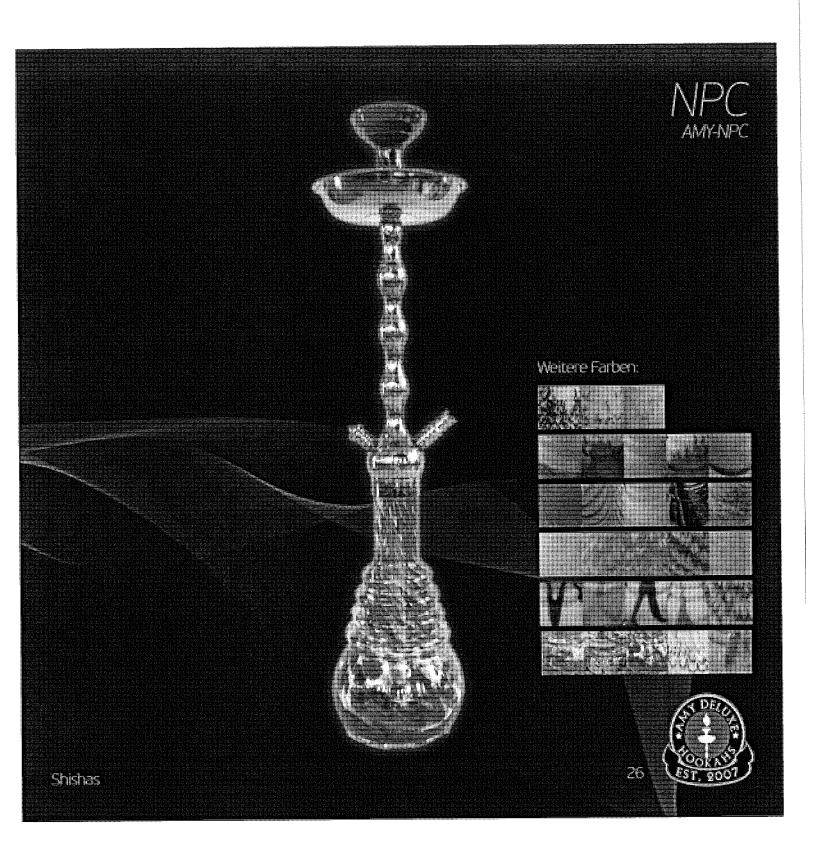


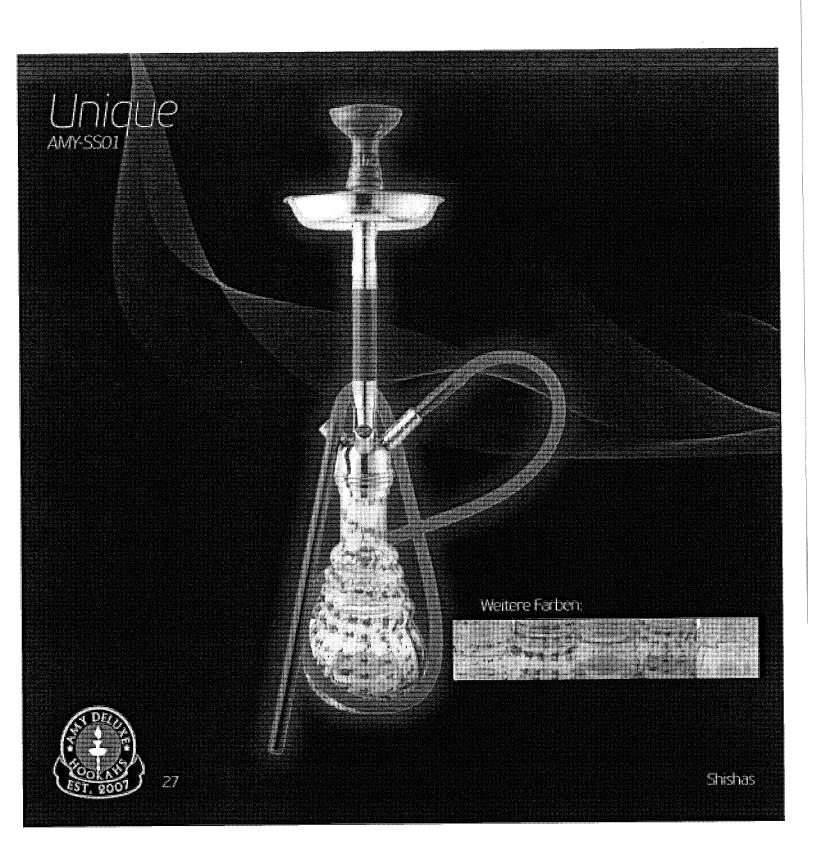


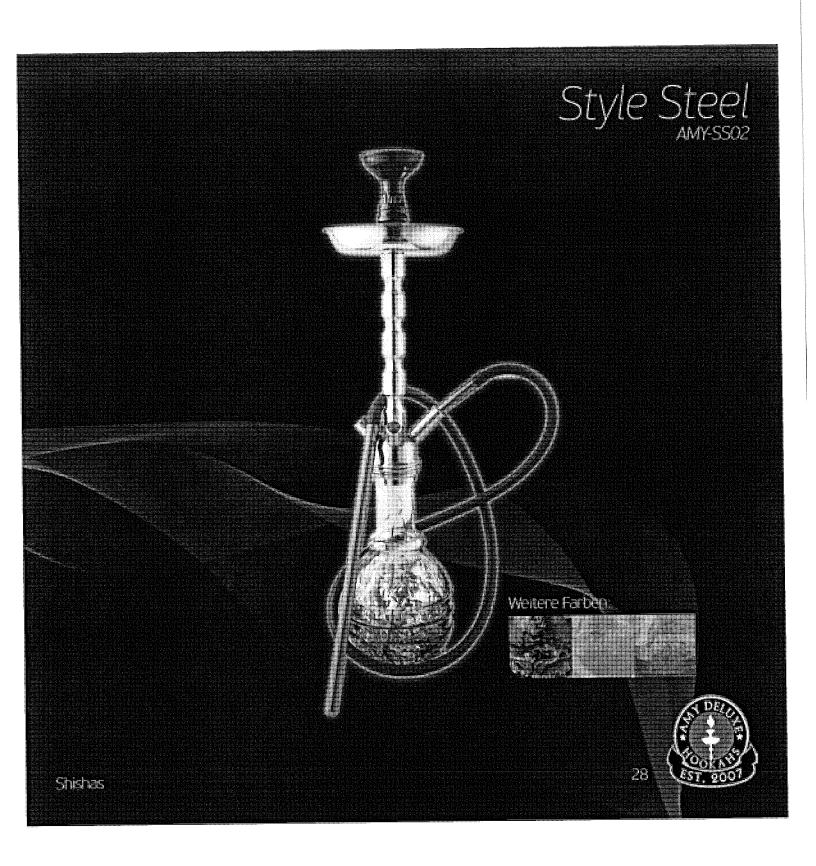












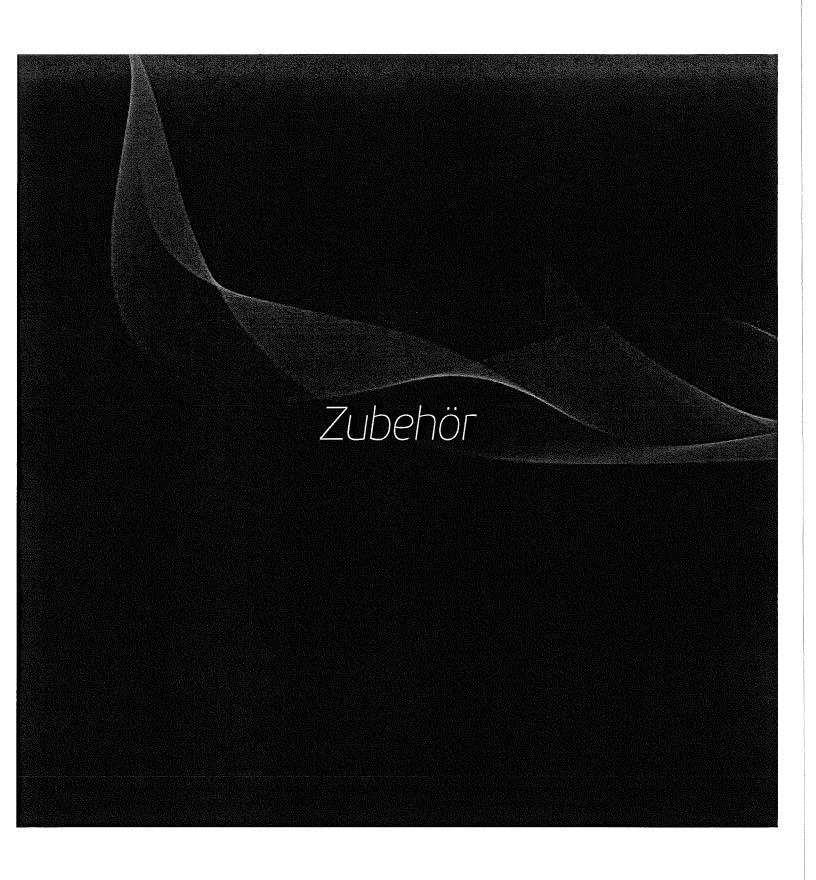
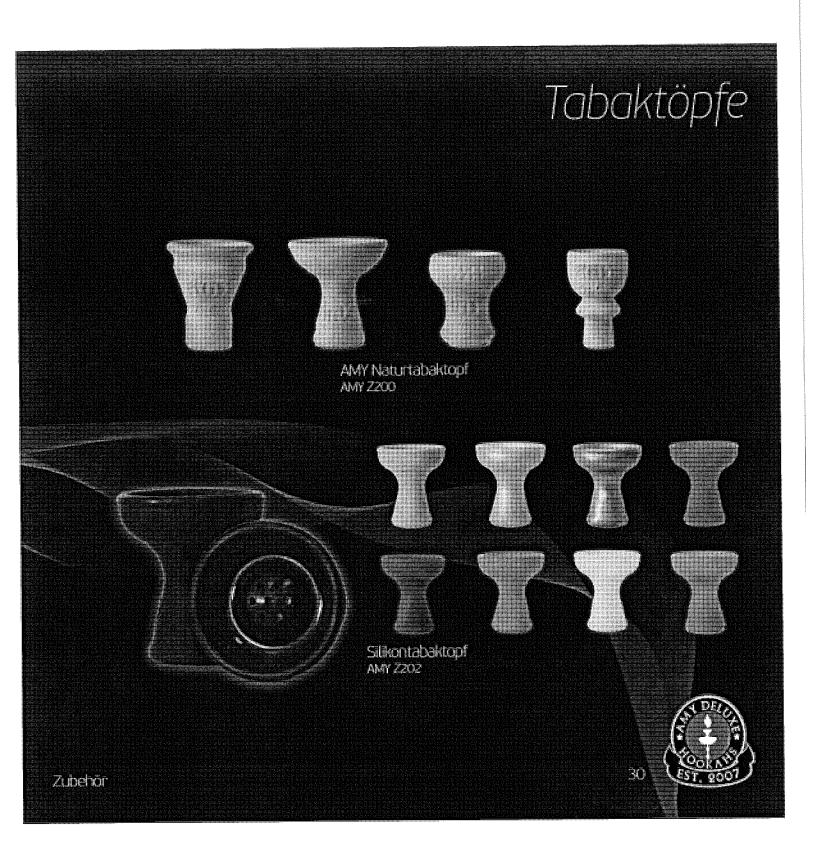
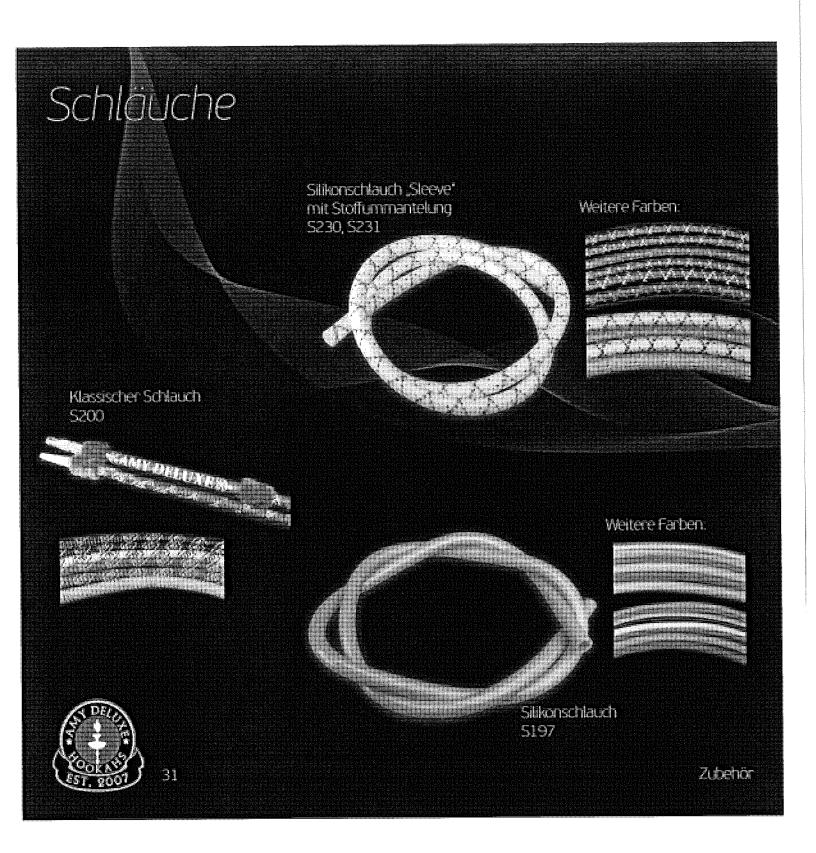
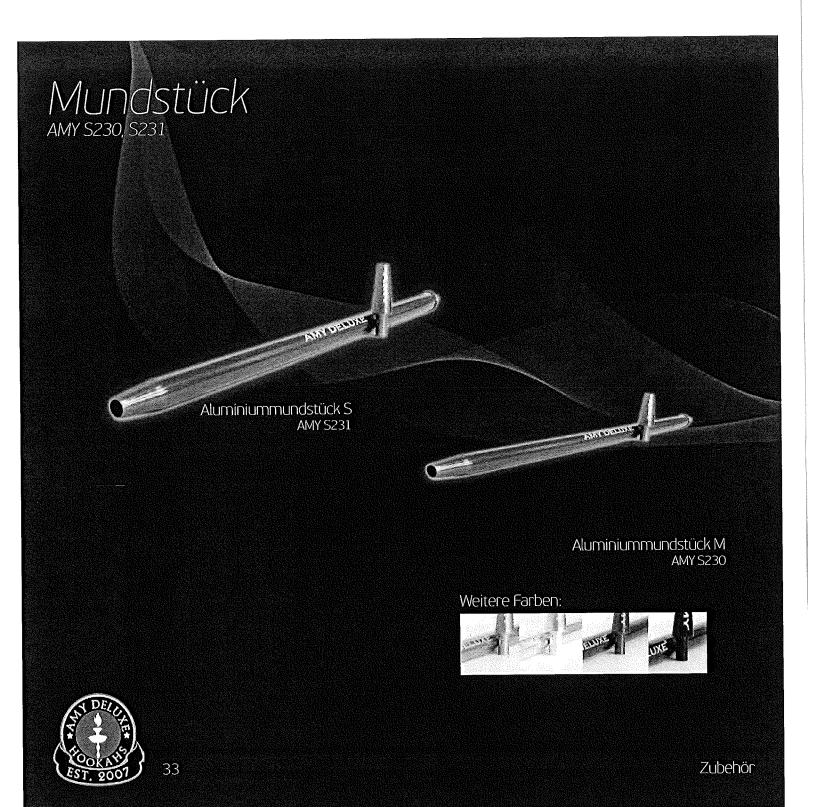


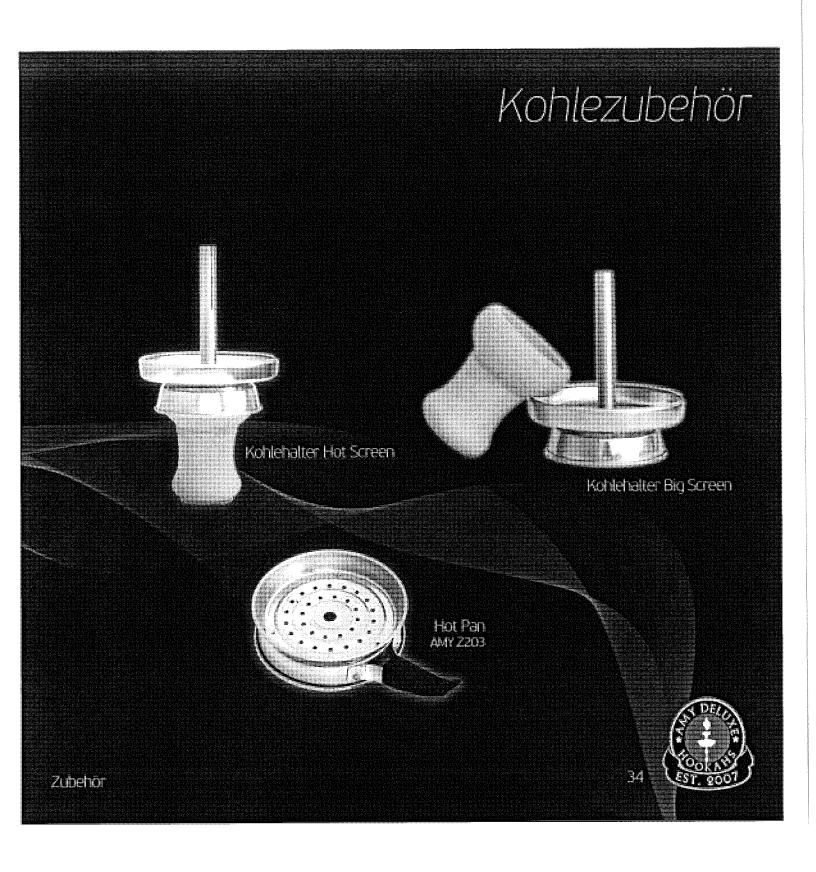
EXHIBIT "C" PART 2 000034











Kohlehalter Long Lasting







Long Lasting 3x1 AMY Z000



Wie funktionieren die Long Lasting Kohlehalter?

Mit dem Kauf eines AMY Deluxe Long Lasting Kohlehalters erwerben Sie ein hochwertiges AMY Deluxe Produkt.

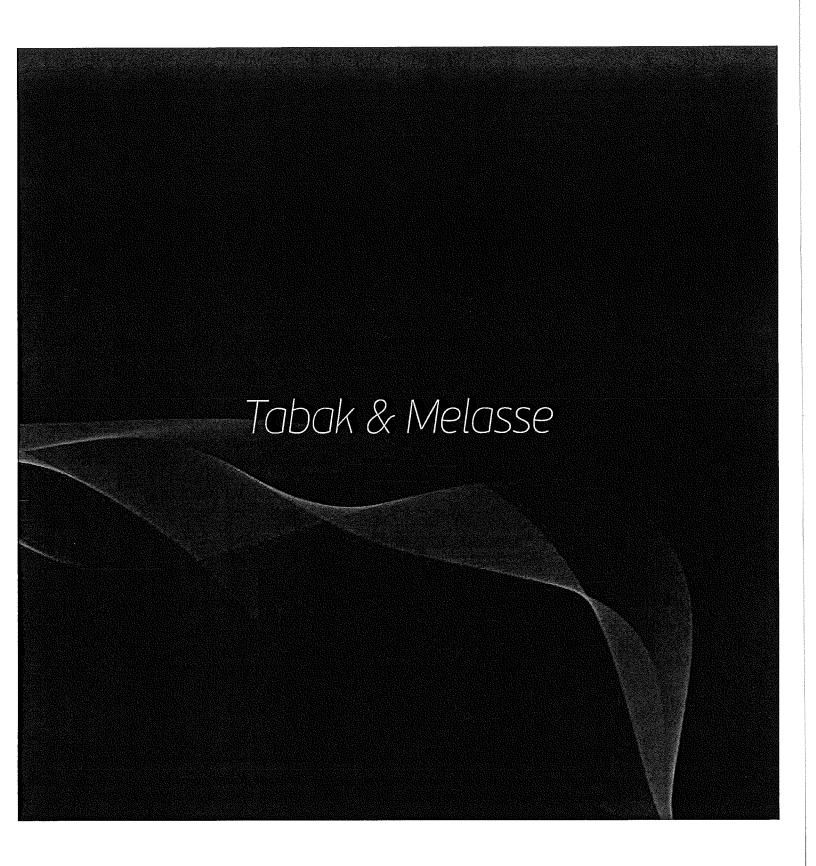
Durch Drehen des oberen Teil des AMY Deluxe Long Lasting entlang der Verschraubung lässt sich der Silikon ummantelte untere Teil (Tabaktopf) leicht befüllen. Beim Long Lasting 2x1 benötigen Sie einen extra AMY Deluxe Silikonkopf

Mit 2-3 Würfel im Kohlehalter platzierter Naturkohle wird alles mit dem Deckelteil wieder verschlossen.

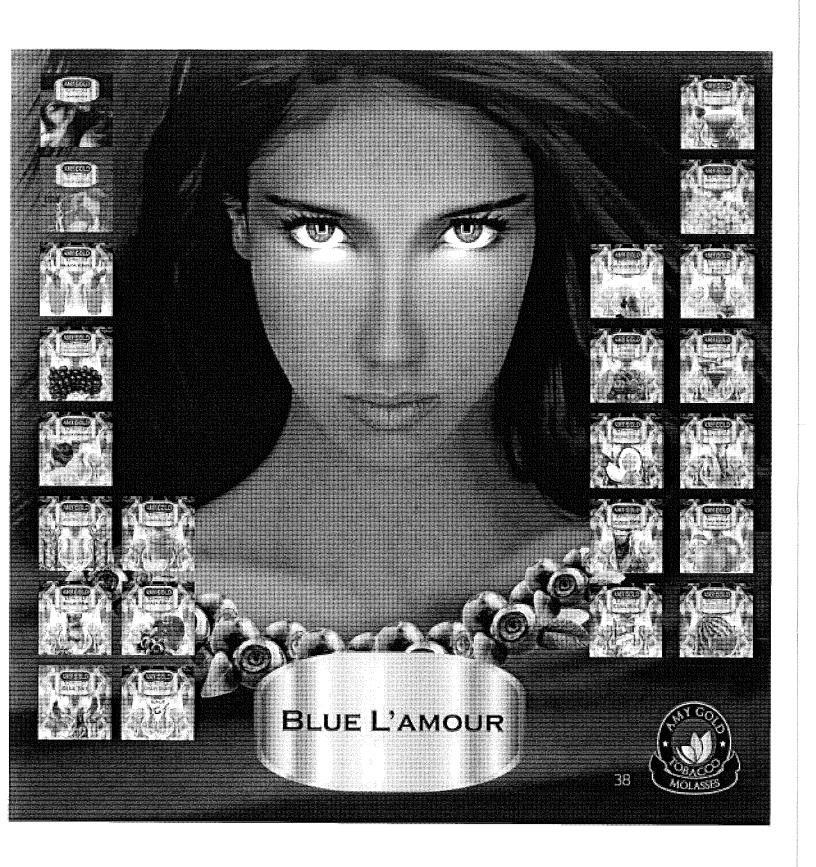
Durch Drehen des Deckelteils lässt sich die Sauerstoffzufuhr für glühende Kohlewürfel regulieren. Je nach Bedarf erzeugt mehr Sauerstoff einen stärkere Glut, verbraucht aber die eingesetzte Kohle schneller.

Nach Verbrauch der Kohlewürfel lassen sich diese einfach mit dem Kohlehalter vom Tabaktopf nehmen und im Haus- oder Biornüll entsorgen.

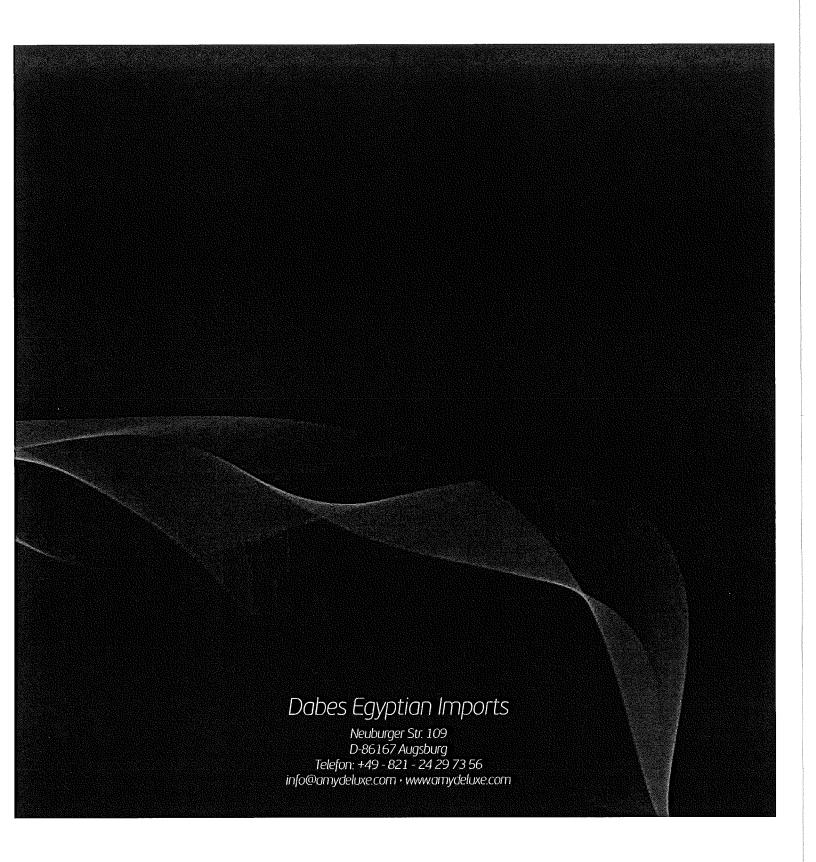












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MOILITY LOGISTICS CORP. 431 SUPREME DRIVE BENEENVILLE, IL 60106 UNITED STATES OF AMERICA Careed Codes

VOR-/VERSCHIPFUNGS-AVIS -PRE-/SHIPPING-ADVICE

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Responsible Person Applying Seal	
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IMPORTS ASSE 103

. JGSBURG

MITY LOGISTICS CORP 1906 ARNOLD CENTER ROAD CARSON CA 90810 UNITED STATES OF AMERICA

Empfänger / Consiçues

SHISHA-CENTER 2116 WEST LINCOLN AVE.

92801 ANAHEIM, CA USA

Dotum : Date

vor-/verschiffungs-avis -PRE-/SHIPPING-ADVICE

Bernetkungan (Remarks)

gru Emptanger / B.L. Consignae

AGILITY LOGISTICS CORP. 21906 ARNOLD CENTER ROAD CARSON CA 90810

UNITED STATES OF Ref INV US0003

MUX0140147 1000131400V

10000,00

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Emplangsnalen/port of destination 10.01. LOS ANGELES CA Endbestimmung@net desthi

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Brutto kg *) Gross weight kos.*)

Vertaden am/shipped on 15.12.2012 vanition

PARIS EXPRESS

COVERED NOT BY US

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SHISHA-CENTER

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BER GMBH

NTAINERLOGISTIK

,L. 089-992294-0 FAX 089-90139081

81829 MÜNCHEN HOFBRÄUALLEE 8

dispo@klolber.com

www.kloiber.com

FAHRAUFTRAG NR.

313471/356983





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MUX0140147,

AUGSBURG

gries: Chaericf.

AGILITY LOGISTICS CORP. 21906 Arnold Center Road Carson

CA 90810

UNITED STATES OF AMERICA

House Appless

Pre Comage by Place of fedelpt (*)

(Cloeon Vesse)

Part of Leading

PARIS EXPRESS

HAMBURG Place of delivery (1)

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Ganaral Agant for Garmon; Agility Logistics GmbH

Heidenkompsweg 82 20097 Hamburg

CCESSORIES 96140090

EAL ES2384854

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TOTAL

10000,0

SHIPPER'S LOAD STOWAGE SHIPPED ON BOARD FREIGHT PREPAID

Purficulars opake fellished by Shipper

SHIPPERS DECLARED VALUE FOR GARDIAGE.

See Ad Valeram Clause Papa 3 (3) on Revense.

Not Applicable

For dalk ery apply 16

AGILITY LOGISTICS CORP. 21906 ARNOLD CENTER ROAD

CARSON, CA 90810 / USA PHONE: 310-507-6771

X copy not negotiable X

Received for snipment in apparent good order and condition

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SHIPPED ON BOARD 15.DEC.2012 Agility Logistics GmbH

Preigns and Charges

Fra got payable of

Number of original 31,12 -0 \NONE-

BREMEN

15.DEC.2012

BREMEN

FOR SEAGUEST LINE (CARMER) Agility Legistics GmbH (as Agent)

000050

GYPTAIN IMPORTS BRAHIM DABES JBURGERSTRASSE 109

86167 AUGSBURG

Consignee, Order of,

SISHA WHOLESALERS 65 SOUTH EISENHOWER LANE LOMBARD

Notify Address

SISHA WHOLESALERS 65 SOUTH EISENHOWER LANE LOMBARD

Pre Carriage by Place of receipt (*) Ocean Vesse Port of Loading YM_VANCOUVER Bremerhaven ort of discharge Place of delivery (*) Norfolk VA Anabeim_ _CA Marks and nos Number and kind of packages description of cargo Said to contain.

UNIT: KKTU7826620 SEAL: 349678

SISHA WHOLE

337 PACKAGE(S) SAID TO CONTAIN WATERPIPES AND

ACCESSORIES

Οf

BILL OF LADING

FOR COMBINED TRANSPORT OR PORT TO PORT SHIPMENT (*)

MUX0141434/001

EXPRESS BILL OF LADING

General Agent for Germany Agility Logistics GmbH

Heidenkampsweg 82 20097 Hamburg

Gross Welght kg

337 7000.00kg

20.000m3

7000.00kg

20.000m3

Total Packages

1

337 7000.00kg 20.000m3

FREIGHT PREPAID

Particulars above furnished by Shipper

SHIPPERS DECLARED VALUE FOR CARRIAGE.

See Ad Valoram Clause Para 8 (3) on Reverse.

For delivery apply to

AGILITY LOGISTICS CORP. 491 Supreme Drive Bensenville, IL 60106 UNITED STATES OF AMERICA NOT APPLICABLE

Received for shipment in apparent good order and condition.

(*) If the column Place of receipt or Place of delivery is filled in this shipment will be treated as combined through transport.

In accepting this Bill of Lading the Merchant expressly accepts and agrees to all its stipulations on both pages, whether written, printed, stamped or otherwise incorporated.

IN WITNESS WHEREOF the number of original Bills of Lading stated below all of this tenar and date has been signed, one of which being accomplished the others to stand vold.

SHIPPED ON BOARD DATE: 03.05.2013

AGILITY LOGISTICS GMBH

Freight and Charges

Freight payable at

Number of original Bs/L

BREMEN Prace of issue

Date

BREMEN

03.05.2013

FOR SEAQUEST LINE (CARRIER) Agility Logistics GmbH (as Agent)



ъ**0**00051 1 Shipper WUHU WANSHEN GLASSWARE CO.,LTD NORTH ERIDGE INDUSTRIAL DISTRICT WUHU DEVELOPMENT AREA,WUHU ANHUI,CHINA 2 Consignee PREMIUM MOLASSES 231 SOUTH EISENHOWER LANE, LOMBARD, IL, 60148 TEL:001 630 6999 000 3 Notlly Party DABES EGYPTIAN IMPORTS MR IBRAHIM DABES TEL:00491799166104 RECEIVED in external apparent good order and condition except as otherwise noted. The FAX:00498215439663 4 Pre-carriage by 5 Place of Receipt 6 Ocean Vessel 7 Port of Loading Bill of Lading as it each ally signed this Bill of Lading. WANNANFANG78HAO V. 182E WUHU,CHINA on of Discharge 9 Place of Delivery REFERENCE NO. CHICAGO, IL USA STIACOSH40000431 PRINCE RUPERT Marks & Nos. Kind of Packages:Description of Goods Gross Weight kgs Measurement No of Container, Seel No. containers! N/M 7460,000KGS SMOKING SET CARTÓNS MILICIAL OF STATES Particulars furnished by merchants GESU3136438 783513(20GP) SHIPPER'S LOAD, COUNT AND SEAL

10 TOTAL NO. OF CONTAINERS

CY-CY-

Ex. Rate:

SHN12999

FREIGHT PREPAID

OR PACKAGES (IN WORDS) 11 FREIGHT & CHARGES

Prepaid at

Total Prepaid

Payable at

No. of Original B(s)/L

THREE

dosu6021499150

SEA TRADE INTERNATIONAL, INC. 海貿國際運輸有限公司

Combined Transport BILL OF LADING

total number of packages or units stuffed in the container, the description of the goods and the weights shown in this Bill of Lading are furnished by the Marchants, and which the carrier has no reasonable means of checking and is not a part of this Bill of Lading contract. The carrier has issued the number of Bills of Lading stated below, all of this tenor and date, one of the original stills of Lading must be surrendered and endorsed or signed against the delivery of the dippent and whereupon any other original Bills of Lading shall be void. The Morchalts agree to be bound by the terms and conditions of lists

27.000M3 NOT CONTAIN (ANY)SÓLID WOOD PACKÍNG MATERIAL per package limitation of liability shall not apply and the ad velorem rate to Carrier's tariff will be charged SAY THREE HUNDRED AND SEVENTY THREE CARTONS ONLY Collect SEATRADE ENTERPRISES CANADA INC 5000 EXPLORER DRIVE, SUITE 204 MISSISSAUGA, ONTARIO CANADA LAW 4T9 TEL: 905-624-6120 FAX: 905-624-7497

Place and date of Issue WUHU, CHINA 2012-06-26

SIgned for the Carrier SEATRADE INTERNATIONAL INC.AS CARRIER

BILL OF LADING Shipper FOR COMBINED TRANSPORT OR PORT TO PORT SHIPWENT DABES EGYPTAIN IMPORTS INH. IBRAHIM DABES NEUBURGERSTRASSE 109 MUX0143459/001 86167 AUGSBURG Consignee Order of COPY - EXPRESS BILL OF LADING WORLD SMOKE SHOP 508 SOUTH BROOKHUREST ST. FFDUEL ANAHĖIM, CA 92804 Notify Address WORLD SMOKE SHOP 508 SOUTH BROOKHUREST ST. General Agent for Germany ANAHEIM, CA 92804 Agility Logistics GmbH te denkampsweg 82 Pre Carriage by Place of receipt 0097 Hamburg Ocean Vessel Port of loading PARIS EXPRESS Hamburg Port of Discharge Place of Delivery Los Angeles CA Anaheim Number and Kind of packages description of cargo said to contain. Marks and nos Gross Weight kg UNIT: TCKU3837497 SEAL: FY296824 Packages 263 7958.00kg 20.000m3 WORLD SMOKE 263 PACKAGE(S) SAID TO CONT 7958.00kg 20.000m3 SHOP WATERPIPES ACCESSOR 1 HS 961 0090 SEAL FY 968 Total Packages 20.000m3 263 7958.00kg FREIGHT PREPAID Particulars above furnish by hipper SHIPPERS DECLARED VALUE FOR CARRIAGE, Received for shipment in apparent good order and condition.

(*) If the column Place of receipt or Place of delivery is filled in this shipment will NOT APPLICABLE be treated as combined through transport. In accepting this DB of Lading the Merchant expressly accepts and agrees to all its stiplations on both pages, whether written, printed, stamped or otherwise incorporated. See Ad Valoram Clause para 8 (3) on Reverse. For delivery apply to AGILITY LOGISTICS CORP. 21906 Arnold Center Road IN WITNESS WHEREOF the number of original Bils of Lading stated below all of this tender and date has been signed, one of which helps accomplished the others to Carson CA 90810 UNITED STATES OF AMERICA SHIPPED ON BOARD DATE : 03.11.2013 AGILITY LOGISTICS GMBH Ocean Freight payable at Freight and Charges Number of original Bs/L BREMEN 0 Place and Date of issue Date. BREMEN 03.11.2013 FOR SEAQUEST LINE (CARRIER)

LDEBREO11MUX-0143459/001

Amerika Cont.

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MTransport

GmbH

Karlsbaderstraße 9 89231 Neu-Ulm Telefon: (0 73 48) 205 64 30 Telefax: (0 73 48) 205 64 39

Auftraggeber

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COMMERCIAL INVOICE

To Messrs:

Company: Shisha Wholesalers

233 Eisenhower Lane S.

Lombard, II; 60148

USA

PHONE: 630 690 9000

TAX: 630-599 1169

From:

Dabes Egyptian Imports

Neuburgerstr. 109, 86167 Augsburg / Germany

To

United States of America

Date:

invoice:

us001_ch

Payment:

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AMY-009 green 8 5 40 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6,30 US\$2 AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6,30 US\$2 AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6 Back blue 8 4 4 4 16 US\$15,00 US\$0,00 US\$6 AMY-009 green 8 5 40 US\$15,00 US\$0,00 US\$6 Back 6 6 6 8 8 48 US\$15,00 US\$0,00 US\$6 AMY-009 green 8 3 5 40 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 36 US\$15,00 US\$0,00 US\$6 AMY-009 green 8 5 40 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 36 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 36 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 36 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 36 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 36 US\$15,00 US\$0,00 US\$6 Back 6 6 6 6 3 30 US\$15,00 US\$0,00 US\$6 Back 7 4 4 US\$15,00 US\$0,00 US\$6 Back 8 4 US\$15,00 US\$0,00 US\$6 Back 9) 4					
dark blue 4 3 12 USS16,00 US\$6,30 US\$26 US\$6,30 US\$26 US\$6,30 US\$27 US\$16,00 US\$6,30 US\$37 US\$16,00 US\$6,30 US\$37 US\$37 US\$31,00 US\$4,00	AMY001		,						
Ight blue 4 3 12 U5516,00 U5\$6,30	74771332			4					
Ted with white 4				4					
AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 6 3 2 4 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 US\$15,00 US\$0,00 US\$6 AMY-009 green 6 5 3 US\$15,00 US\$0,00 US\$6 Fred with white 8 3 2 US\$15,00 US\$0,00 US\$6 Black 8 4 32 US\$15,00 US\$0,00 US\$6 Black 8 4 32 US\$15,00 US\$0,00 US\$6 Black 8 4 32 US\$15,00 US\$0,00 US\$6 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 4 24 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 5 4 24 US\$15,00 US\$0,00 US\$5 AMY-0018 black 4 5 20 US\$23,00 US\$10,50 US\$5 AMY-0019 USA6 4 1 4 4 US\$15,00 US\$0,00 US\$5 AMY-0010 USA6 4 1 4 4 US\$15,00 US\$0,00 US\$5 AMY-0010 USA6 4 1 4 4 US\$15,00 US\$0,00 US\$5 AMY-0017 clark blue 6 5 4 24 US\$15,00 US\$0,00 US\$5				1					
AMY-003 Veltow 4 4 4 10 35,16,00 U\$\$0,00 U\$\$1.5 AMY-004 Bibli Company Co				4					
AMY-0015 light	LCOVIMA				and the second second second second second second				
AMY-009 Breen B B B B B B B B B									
AMY-009 green 6 5 30 US\$15,00 US\$0,00 US\$6,00	Amino				COLUMN TO THE OWNER OF THE OWNER			24	
AMY-009 green 8 5 40 US\$15,00 US\$0,00 US\$6	/								
Dark blue 8 5 40 U5515,00 U5\$0,00 U5\$6	(20		8			THE RESERVE AND ADDRESS OF THE PARTY OF THE		
AMY-009 Brown 6 3 18 U\$\$15,00 U\$\$0,00 U\$\$2	,	Dark blue		8				- 1 - 1	
Brown 6 3 18 US\$15,00 US\$0,00 US\$5	COD VKAA			8			THE RESERVE AND LOSS OF THE PERSON NAMED IN		
black 66 6 30 U\$\$15,00 U\$\$0,00 U\$\$4	24011-00-3			6					
Ted				6			THE RESERVE AND ADDRESS OF THE PERSON NAMED IN		
Dark blue G S 48 U\$515,00 U\$\$0,00 U\$\$2				6			And the last of th		
AMY-009 green 6 5 30 U\$\$15,00 U\$\$0,00 U\$\$5 red with white 8 3 24 U\$\$15,00 U\$\$50,00 U\$\$5 iblack with white 8 4 32 U\$\$15,00 U\$\$0,00 U\$\$5 iblack with white 8 4 32 U\$\$15,00 U\$\$0,00 U\$\$5 iblack 8 8 4 32 U\$\$15,00 U\$\$0,00 U\$\$5 iblack 8 8 4 32 U\$\$15,00 U\$\$0,00 U\$\$5 iblack 8 8 4 24 U\$\$15,00 U\$\$0,00 U\$\$5 iblack 8 6 4 24 U\$\$15,00 U\$\$10,50 U\$\$5 iblack 8 6 5 30 U\$\$10,50 U\$\$10,50 U\$\$5 iblack 8 6 5 30 U\$\$10,50 U\$\$10,50 U\$\$5 iblack 9 4 1 4 U\$\$10,50 U\$\$5 iblack 9 4 1 1 1 4 U\$\$10,50 U\$\$5 iblack 9 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				6					
red with white 8 3 24 U\$\$15,00 U\$\$0,00 U\$\$5,00 U\$\$	A A A A CO CO CO	}		6					
Mack with white 8 3 24 U\$\$13,00 U\$\$0,00 U\$\$5 Vellow 8 4 32 U\$\$15,00 U\$\$5,00 U\$	AMY-009			8			and the second		
Yellow	}			В					
black 8				3					
dark blue				8	4	and the second s			
red with white				8	4		THE RESERVE AND PROPERTY AND PERSONS ASSESSED.		
black with white 6			1	6	3		THE RESERVE AND ADDRESS OF THE PARTY AND ADDRE		
yellow 6 4 24 C933,00 US\$50,00 US\$ black 6 6 6 36 US\$15,00 US\$0,00 US\$ closed US\$15,00 US\$0,00 US\$ closed US\$15,00 US\$0,00 US\$ closed US\$10,50 US\$ closed US\$ cl				6	4		The second secon	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
black 6 6 36 US\$15,00 US\$0,00 US\$				6			THE RESIDENCE OF THE PERSON NAMED IN COLUMN 2 IS NOT THE OWNER.		
AMY-0017 dark blue 6 4 24 05313,00 US\$10,50 US\$ AMY-010 Black 4 5 20 US\$23,00 US\$10,50 US\$ AMY-010 Oark blue 4 1 4 US\$23,00 US\$10,50 US\$ Oark blue 5 30 US\$24,00 US\$0,00 US\$				6		and the second s	a series for the series of the	/	
AMY-010 Black 4 5 20 05325,00 052435 US\$ AMY-010 Dark blue 4 1 4 US\$23,00 US\$10,50 US\$ 0 5 30 US\$24,00 US\$0,00 US\$	1110 5017			6			The second second second second second	,01	
AMY-010 Dark blue 4 1 4 05323,00 USS0,00 USS	VMA-00T\			4					
	C10-YMA			4	Company of the Park of the Par			-	
					5	30			, , , , , , , , , , , , , , , , , , , ,

					52256.50	.ŲS\$10,50	USSS84,00
	blue	4	4		U\$\$26,00 U\$\$26,00	US\$10,50	U\$\$438.00
1D990	black	4	3	12	US\$26,00	US\$0,00	US\$624,00
water with a statement of the party of the statement of t	Brows	6	4!	24	U\$\$26,00	US\$0,00	US\$624,00
10990	black	6	1	24	US\$24,00	U\$\$0,00	US\$576,00
	red	- 5	4	24		US\$0,00	US\$576,00
	blue	5	4	24	U\$524,00	US\$0,00	US\$576,00
10630	black	б	4	24	US\$24,00		US\$552,00
The second secon	red	4	4	16	U5524,00	US\$10,50 US\$10,50	US\$966,00
	blue	4	7	28	05\$24,00		US\$552,00
ID630	black	4	4	16	US\$24,00	US\$10,50	US\$240,00
10000	red with white	12	2	24	US\$10,60	U\$\$0,00	US\$600,00
	green	12	5	60	US\$10,00	U\$\$0,00	
	vellow	12	2	24	US\$10,00	US\$0,00	US\$240,00
	white	12	2	24	US\$10,00	U\$\$0,00	U\$\$240,00
	black	12	7	84	US\$10,00	US\$0,00	US\$840,00
	green with blue	12	2	24	US\$10,00	U\$\$0,00	US\$240,00
	red with blue	12	2	24	US\$10,00	U5\$0,00	US\$240,0
	red	12	2	24	US\$10,00	US\$0,00	US\$240,0
	black line	12	2	24	US\$1	US\$0,00	U5\$240,0
	Brown	12	4	48	U&SA72.00	US\$0,00	US\$480,0
		12	8	96	0/55.8,00	U\$\$0,00	US\$960,0
	dark blue	12	2	24	\$\$10,00	US\$0,00	US\$240,0
1D760	blue	6	2	12	US\$10,00	US\$7,00	US\$204,0
	red with white	6	2	45	US\$10,00	US\$7,00	U5\$204,0
	green	6	2		US\$10,00	US\$7,00	US\$204,0
	yellow	6	2	くつ	US\$10,00	US\$7,00	US\$204,0
	white			12	US\$10,00	US\$7,00	US\$204,0
	black	6		12	US\$10,00	US\$7,00	US\$204,
	green with blue	6		12	US\$10,00	US\$7,00	U\$\$204,
	red with blue	6		12	U\$\$10,00	US\$7,00	US\$204,
	hlack	6		12	US\$10,00	US\$7,00	US\$204,
	Brown	6	2	12	US\$10,00	US\$7,00	US\$204,
ID760	blue		2	36	U\$\$10,50	LIS\$0,00	US\$378,
	black		3		US\$10,50	U\$\$0,00	US\$378,
	blue	- N	3	36	US\$10,50	US\$0,00	US\$630,
	green	12	5	60	U\$\$10,50	US\$0,00	US\$252
	red	12	2	24		U\$\$0,00	U\$\$252
Egs-53	vellow	12	2	24	US\$10,50	US\$0,00	US\$2.376
=84	dark blue	6		72	U\$\$33,00	US\$0,00	U\$\$3.762
amy 005	black	6		114	US\$33,00	U\$\$0,00	US\$396
,	brown	6		12	U\$\$33,00	US\$0,00	US\$558
	light blu	6		18	US\$31,00		US\$558
	dark	6	3	18	U\$\$31,00	U\$\$0,00	US\$558
amy 00d		6	3	18	U\$\$31,00	135,000	US\$558
amy 004	Now Y	6	3	18	US\$31,00	U\$\$0,00	
	green		2	1.2	U5\$31,00	US\$0,00	US\$372
				1	US\$2,800,00		U\$\$2.800
Transporting cost fro Wuhu to LA	om			1	(/3,72,1000,000	L	US\$46.959

Please do not act

SAY USD

46959,2 usd

Bank information:

Postbank München

Bank:

Dabes Ibrahim

Benificialry: BL2:

72010080 DE93700100800724682802

IBAN: BIC:

PBNKDEFF

COMMERCIAL INVOICE

To Messrs:

Premium Molasses

Add: 1056 East Wilson Ave, Lombard, II 60148

Date:

01.06.2012

Invoice No: US0002_CH

From:

Dabes Egyptian Imports Neuburgerstr. 109, 86167 Augsburg/Germany

Payment:

T/T

To:

United States of America

WATER PIPES And accessories

ITEM NO	COLOR	CTNS	PACKING RA	γтα	unit pric	Amount	СВМ
	DARK BLUE	5	12		14	840	0, 37224
	SB GOLD	5	12	60	14		0, 37224
QT04	SB/RED/WT	3	12	36	14		0, 223344
	BK GOLD	5	12	60	14	840	0, 37224
•	BK/RED/WT	5	12	60	14	840	0, 37224
	DARK BLUE	9	12	96	14, 5	1392	≯ 670032
An Rosen	BK/RED/WT	6	12	84	14, 5		446688
QT05	SB/RE/WT	.9	12	96	14, 5		0,870032
	BK GOLD	6	12	60	14,5	\$10	0, 446688
	SB GOLD	9	12	120	14, 5	X170	0, 670032
Alfalia en al	DARK BLUE	3	6	18	33	594	0, 257796
	GREEN	3	6	18	33	594	0, 257796
AMY012	BK/RED/WT	3	6	18	<u>ര</u> ി	594	0, 257796
	RED	3	6	18	133	594	0, 257796
	BLACK WITH WHITE	0	6	0	1 39	0	0
	BU/RED/WT	3	6	1.8	×33	594	0, 257796
	RED WITH WHITE LINE	0	6	0	33	0	0
AMY016	RED	4	6	1 24		792	0, 343728
	BLACK	4		24	33	792	0, 343728
·	GREEN	4	6	Y 24	33	792	0, 343728
	BLUE	12		66	14	924	0,5304
AMY440	GREEN	6	6	42	14	588	0, 2652
	BLACK	12	6	72	14	1008	0, 5304
	RED	<u></u>	6	72	14	1008	0,5304
AMYO23	BLUE		6	90	25	2250	0,773388
	GREEN	9	6	96	25	2400	0,773388
AMYO24	BLUE	15	6	48	33	1584	1, 28898
	GREEN	15	6	48	33	1584	1, 28898
	BLUE-2	8	6	48	17	816	0, 3536
	PURPLE-2	8	6	48	17	816	0, 3536
Date (o	GREEN-2	8	6	48	17	816	0, 3536
AMYO18	BLUE-3	8	6	42	17	714	0, 3536
	BLACK 3	8	. 6	0	17	-0	0, 3536
	AMBER-4	8	6	42	17	714	0, 3536
		8	6	48	17	816	0, 3536
	BLUE-2 PURPLE-2	4	6	24	34, 5	828	0, 343728
		4	6	24	34, 5	828	0,343728
URÍOLO	GREEN-2	4	6	24	34, 5	828	0, 343728
AMY019	BLUE-3	4	6	24	34, 5	828	0, 343728
	BLACK-2	4	6	24	34, 5	828	0, 343728
	AMBER-3	4	6	24	34, 5	828	0, 343728
	AMBER-4	4	6	24	34, 5	828	0, 343728
	RED-2	3	4	12	34	408	0, 257796
	AMBER-5	5	4	20	34	680	0, 42966
	BLUE-4	8	4	32	34	1088	0, 687456
AMY021	PURPLE-3	4	4	16	34	544	0, 343728
	BLUE-5	8	4	32	34	1088	0, 687456
	AMBER-6	8	4	32	34	1088	0, 687456
	CLEAR-1	4	4	16	34	544	0, 343728

	T 21 1 21/ 2		,				
<u> 2000 - </u>	BLACK-3	8	4	. 36	34	1224	0,687456
	BLUE-1	8	4	28	35	980	0, 687456
	GREEN-1	8	4	28	35	980	0,687456
AMY022	PURPLE-1	5	4	20	35	700	0, 42966
	BLACK-1	8	4	32	35	1120	0,687456
	RED-1	5	4	24	35	840	0, 42966
	AMBER-2	8	4	52	35	1820	0, 687456
	RED-BLACK	5	б	30	31	930	0, 42966
SHISHAM	BLUE-BLACK	5	6	30	31,	930	0, 42966
	GREEN-BLACK	5	6	36	31	1116	0, 42966
	bid adapter			700	0, 8	560	0
accessories	small adapter			700	0, 5	350	0
	glasses for amy440			60	5	300	O
	glasses for id630			30	11	330	0
	glasses for q4			30	4,5	135	0
				3868		55411	26, 821232
	Shipping cost					3800	-
	TOTAL					50211	

SAY US Dollar 59211 USD

Bank information;

Bank:

Postbank München

Benificialry:

Bank account: 724682802 Dabes Ibrahim 720 100 80

BLZ: IBAN:

DE93 7001 0080 0724 6828 02

BIC:

THE SELECTION OF THE SE PBNKDEFF

To Messrs:

Shisha-center

2116 West Lincoln Ave Anahelm, Ca 92801

USA

Date:

19, 11, 2012

Invoice: Payment: US0003_Œ T/T



From:

Dabes Egyptian Imports

Neuburgerstr. 109, 86167 Augsburg / Germany

To:

United States of America

WATERPIPES and accessories

item no	COLOR	etsn	packing	gty	price	amount
	green	15			US\$35, 00	
AMY016	red	15	6	90	0 \$35,00	US\$3, 150, 00
	black	35	6		US\$35, 00	
	clear	10	6	60	US\$33,00	
	dark red	10	6	S 0	US\$33, 00	
	dark brown	10	6	60	US\$33,00	US\$1. 980, 00
AMY005	amber	10	<u></u>		US\$33, 00	US\$1, 980, 00
	dark blue	10	10		US\$33, 00	US\$1, 980, 00
	blue	40		240	US\$33, 00	US\$7, 920, 00
			$(x)^{y}$			
	red	<u></u>	6	72	US\$13,00	US\$936, 00
	pink	1 12			US\$13, 00	US\$936, 00
AMY023	purple	12	6	72	US\$13,00	US\$936, 00
7001023	blue	12.	6	72	US\$13,00	US\$936, 00
	black	12	6	72	US\$13,00	US\$936, 00
	N	Y				
	blue 🔏 🗸	12	6	72	US\$14,00	US\$1, 008, 00
	purple	12	б	72	US\$14,00	US\$1.008,00
	black O	12	6	72	US\$14,00	
AMYO24	red	12	6	72	US\$14,00	
	pink	12	6	72	US\$14,00	US\$1.008,00
					00.93 11 00	00011 000, 00
	diverent color	20	6	120	US\$31,00	US\$3, 720, 00
AMY004						
	different color	8	6	48	US\$16,00	US\$768, OC
АМУО15)				,,,,,,	,,,,,,,,
	amber1	8	4	32	US\$35, 00	US\$1, 120, 00
АМУ022	amber2	4	4	16	US\$35, 00	US\$560, 00
1111, 522				20	0.590.34 0.0	1,0,4,5,0,3,5,5
· · · · · · · · · · · · · · · · · · ·	amber	3	4	12	US\$35, 00	US\$420,00
	transparent	2	4	8	US\$35,00	
λMY021	blue	6	4	24	US\$35,00	US\$840, 00
71011021	red	4	4	16	US\$35,00	US\$560, 00
	100			10	03939,00	039000,00
,	amber	5	6	30	US\$25,00	US\$750, 00
AMY006	black	15	6	90	US\$25, 00	
AHIOO	DIACK	15		90	05\$25,00	US\$2. 250, 00
	different color	24	6	141	tigent on	11064 464 00
AMY NPX	dillerent color	24	р	144	US\$31,00	US\$4. 464, 00
· · · · · · · · · · · · · · · · · · ·	different color			0.1	Licides E. Con-	Nessee Ar
AMYO17	dillerent color	3	8	24	US\$15, 00	US\$360, 00

AMY110	different color	29	12	348	US\$14, 0	0 (50%) 000
	witer .			- 710	03314, 0	0 US\$4, 872, 0
QT004	different color	9	12	108	US\$14, 0	O Heer can o
ОТООТ	different color				00011,0	US\$1, 512, 0
QT005	directarit color	35	12	420	US\$14, 50	US\$6, 090, 0
	blue					10002 000, 00
Name	red	13	12	156	US\$8, 00	US\$1, 248, 00
AMY020	black	3	12	36	US\$8, 00	US\$288, 00
	amber	3 4	12	36	US\$8, 00	US\$288, 00
	dark blue	4	12	48	US\$8, 00	US\$384, 00
OTTO A A		1	12	48	US\$8, 00	US\$384, 00
QT003	different color	41	12	492	Heert on	
				432	US\$11,00	US\$5, 412, 00
AMY POWER HOSES	different color					
The state of the s	Curetelit Color	28	36	1008	US\$3, 80	US\$3, 830, 40
AMV CTI TVON. 4141	different color					0545, 050, 40
AMY SILIKON+ALU	amorar a color	40	25	1000	US\$10,00	US\$10, 000, 00
	blue					127101 000, 00
AMY CERAMIC BUWL (8)	black		120	120	US\$1, 00	US\$120, 00
	red	1		y 120	US\$1,00	US\$120,00
	white	1	~ 70 ×	120	US\$1,00	US\$120, 00
AMY CERAMIC BOWL (1)	black	1	300	120	US\$1, 00	US\$120,00
	red		120	120	US\$1,00	US\$120,00
UN oppos	blue		144	120	US\$1,00	US\$120, 00
AMY CERAMIC BOWL (4)	red	5	144	144	US\$0, 90	US\$129, 60
	black	1	144	144	US\$0, 90	US\$129,60
AMY008 with case		7		144	US\$0, 90	US\$129, 60
MILLOOG WILL Case	different color	25	4	100	US\$46, 00	US\$4, 600, 00
	7				32710, 00	0334, 000, 00
AMY012	different con	10				
amy012 with case		10	6	60	US\$35, 00	US\$2, 100, 00
		10	4	40	US\$46, 00	US\$1, 840, 00
	yettow	3	- 10			
id760	OT CUP	3	12 12	36	US\$11,00	US\$396, 00
^	Nisck/line	3	12	36	US\$11,00	US\$396, 00
	white	3	12	36	US\$11,00	US\$396, 00
	differ color	22	12	36 264	US\$11, 00	US\$396, 00
AMYO25 O Y				204	US\$11,00	US\$2, 904, 00
AMIONS	blue	3	6	18	US\$33, 00	1220-50
	dark blue	3	6		US\$33, 00	US\$594, 00
	clear	3	6		US\$33, 00	US\$594, 00
	dark red	3	6		US\$33, 00	US\$594, 00
	amber dark brown	3	6		US\$33, 00	US\$594, 00 US\$594, 00
	dark brown	3	6		US\$33, 00	US\$594, 00 US\$594, 00
- AMY012	differen color				-2,00,00	<u> </u>
	anieran colot	- 8	в	48	JS\$33, 00	US\$1.584,00
	ı i	1				-041, 004, UU
c10052	red	6	6		1	1

		<u>. 44</u>						
big snake				12	4	48	US\$49,00	US\$2, 352, 00
c1x0091	blue			4	6	24	US\$20, 00	
bambino AMY007	- Litter			20	20	400	US\$4, 00	
amy024 with bag	different color			40	6	240	US\$32, 00	US\$7, 680, 00
Amy023 with bag	different color	27 L	1.5	8	8	64	US\$17,00	US\$1, 088, 00
	Minorani Color			35	8	280	US\$16,00	US\$4, 480, 60
Transport	ing cost	1527.000						
				I.	1	<u> </u>		US\$4, 400, 00
								US\$133. 675, 20

SAY USD

133675,20 usd

Bank information:

Bank:

Postbank München

Benificialry:

BLZ: IBAN:

BIC:

COMMIRE CLAILLY SERVED TO THE COMMITTEE COMMIT

To Messrs:

Company: Shisha Wholesalers

233 Eisenhower Lane S.

Lombard, IL 60148

USA

PHONE: 630-690-9000 FAX: 630-599-1169

FAX:

Dabes Egyptian Imports From:

Neuburgerstr. 109, 86167 Augsburg / Germany

To:

United States of America



06.01.2013

Invoice: Payment:

US0004_GE 1/1



WATERPIPES and accessories

item no	COLOR	ctsn	packing	qty	price	amount
**************************************	Scorpion with silv.	12	6	72	US\$31,40	
NPX Expensive	Spider silver	12	6	72	US\$31 \ 00	US\$2, 232, 00
*	Butterfly black	12	6	72	19831-70	US\$2, 232, 00
	1.1.1.	5	6	30.	US\$32, 00	US\$960, 00
	black	5	6	30	65\$32,00	US\$960, 00
HIVOOS	blue	5	6	100	US\$32, 00	US\$960, 00
АМУ005	white	5	6		US\$32, 00	US\$960, 00
	amber	3	0		03332,00	03,900, 00
	red	6		72	US\$13,00	US\$936, 00
	. pink	6		72	US\$13,00	US\$936, 00
AMY023	purple	∡ 6	12	72	US\$13, 00	US\$936, 00
	black	, 8	12	96	US\$13,00	
	green	1	12	60	US\$13, 00	US\$780, 00
- 1111 	green	1 5	12	60	US\$14,00	
	purple P	6	12	72	US\$14, 00	
	black	7	12	84	US\$14, 00	
AMY024	red	6	12	72	US\$14,00	
			12	72		
	pink	6	12	12	US\$14,00	05\$1.008,00
	black	15	4	60	US\$35, 00	US\$2.100,00
	ambe	8	4	32	US\$35, 00	
	a e	8	4	32	US\$35,00	US\$1, 120, 00
AMY022		11	4	44	US\$35, 00	
	ourple	8	4	32	US\$35, 00	US\$1, 120, 0
٠, ١) Sapio				0,0000,00	7071.130, 0
4 22	diff.color	30	6	180	US\$24, 00	US\$4, 320, 00
Amy06						
	black	8	4		US\$34, 00	
	amber blue	8	4	32	US\$34, 00	
AMY021	blue red white	8	4	32	US\$34,00	
KM1021	blue white	8	4		US\$34, 00	US\$1,088,0
	amber	5	4	20	US\$34, 00	US\$680, 0
	black/trons	5	4	20	US\$34, 00	US\$680, 0
1178.4.40	his at	10		0.10	LICETE NO	1/000 010 0
AMY440	black	40	6	240	US\$16, 00	US\$3, 840, 00
amy156 (big snake)	diff, color	25	4	100	US\$47, 00	US\$4, 700, 00
	mix color	25	6	150	US\$24, 00	US\$3, 600, 0
NPX Cheap						

, <u>, , , , , , , , , , , , , , , , , , </u>	mix color	25	12	300	US\$11,00	US\$3, 300, 0
gt003 (jinn)						
	blue	4	12	48	US\$8, 00	US\$384, 0
AMYO20	red	4	12	48	US\$8, 00	US\$384, C
# AM1020						
	light blue	4	12	48	US\$8,00	US\$384, 0
Amy027	blue	. 5	6	30	US\$24,50	US\$735, (
	red	5	6	30	US\$24, 50	US\$735,
	green	5	6	30	US\$24,50	US\$735,
	amy022	1	12	12	US\$13,00	US\$156,
	amy021	1	12	12	US\$14,00	US\$168,
	amy018	1	12	12	US\$9,00	
	amy019	1	12	12	US\$13,00	US\$156,
Glass						
	amy05	1	12	12	US\$14,00	US\$168,
	Amber	6	6	36	US\$18,00	US\$648,
AMYO18	purple	7	6	42	US\$18, 00	US\$756,
	black	6	6	36	US\$18,00	\ US\$648,
	Amber	5	6	30	US\$33, 1 0	US\$990,
	black	8	6	48	US\$ (a,	US\$1, 584,
7.0	blue	5	6	30	1633, 00	US\$990,
	light blue	6	6	30	\$\$32,00	US\$990,
	green	5	6	30	US\$33, 00	US\$990,
AMY019	purple	5	6		ÚS\$33, 00	US\$990,
AMD 19	red	5	6		V US\$33, 00	US\$990,
				$\lambda \lambda$		
Transpor	ting cost		\sim	∨ 1		US\$3, 800, 0

Notal: 70373,00 USD

SAY USD

Bank information:

Bank:

Benificialry:

BLZ: IBAN: BIC:

66573,00 USD + 3800 USA

Postbank München
Dabes Ibrahim
72010080
DE9370010086072469
PBNKDEFF

To Messis:

Company: World smoke shop 508 south brookhurest st. Anahoim, CA 92804

USA

PRONE: 0017143100778. FAX: 0017147744769

From:

Dabes Egyptian Imports
Neuburgerstr. 109, 86167 Augsburg / Germany

To:

United States of America

000063 Rasse

12. 04. 2013 US000 GE 7/T Date: Invoice: Payment:



	WATERPIPE	S and acc	essorles			Dabes Egyptian I	mports
tem no	COLOR	etsn	packing	qty	price	Asolnirgerstr. 109	A.A
		ļ		<u> </u>	lineno.	36167 Augsbur	ioriae'
en e	6 different color	24	- 8	14	1 US\$32, 0		
		+		 			<u>Variables</u>
AMY005		 		 		info@orientaliacle	2-ft9(Hmaner
		 					
							/
	7 different color	70	4	28	08835,	00 US\$9. P.O.	
			<u> </u>	ļ	<u> </u>		
AMY022				ļ	<u> </u>	Y	
1447.445			ļ	 	-	X Y	
			 	 	 	1	
	7 different color	70	1 1	28	0 US\$64	0589, 520, 00	
	7 different color	+	 	1 20			
		 	 	 			
AMY021					NA N		
				1	\mathcal{D}		
					1		
AMY440	17 different color	51	1	30	6 US\$16,	00 08\$4, 896, 00	
			-) 	0 US\$24.	00 US\$1, 440, 00	
Amy 630	diff. Color black shaft	10		6	0 05324,	00 0331, 440, 00	
	mix color silver shaft	1		19	2 US\$31,	00 US\$5, 952, 00	
NPX	THIX COIOI SHVEL SHALL	1 ×		4			
)	—			
Amy027	blue			1	2 US\$24,	50 ES\$294, 00	
, , = .							
	6 different color	36	(3 21	6 US\$33,	00 US\$7, 128, 00	
	Y		 				
		_					
Any 019			-	 			
	red ne		1	3 2	4 US\$35,	00 US\$840, CO	
AMYO16							
)						
AMYOO7	6 different color	18	3	10	8 US\$32,	00 US\$3.456,00	
			ļ		0 110010	00 US\$5, 000, 00	
	different color		 	50	0 08\$10,	00 05\$5, 000, 00	
							
(kon hose with Alm or a	101		 				
		-		1			
			1	1	1		
	red		5	8 .	0 US\$16,		
	pink				0 US\$16,		
ANYO23 with bag	purple				0 US\$16,	00 US\$640, 00	
	blue				0 ÚS\$16,		
	black		5	8 4	O US\$18,	00 US\$640, 00	
					11001	00 US\$840, 00	
	blue		5 1	_	00 US\$14, 00 US\$14,		
110001	purple		5 1		io US\$14,		
VARAOS4	green		5 1		0 05\$14,		
	red						
	pink		5 1	2] /	0 US\$14,	00 US\$840, 00	

	6 differ	30	ô	180	US\$25,00	US\$4, 500, 00
AMY006						
	different color			500	US\$10,00	US\$5, 000, 00
silikon hose with acryl						
				1440	US\$5, 50	US\$7. 920, 00
				0		US\$0, 00
Batcha incl ceramic bowl	****			0		US\$0, 00
				0		US\$0, 00
				0		US\$0, 00
Transportin	g cost			1		US\$3, 200, 00
						US\$80, 954, 00

SAY USB Bank information: Bank: Benificialry:

IBAN: BIC:

80954,00 USD

Postbank München Dabes Ibrahim 72010080 DE93700100800724682802 PBNKDEFF

Dabes Egy Na. Introfts
Neuburg 91. 19
8616 Abus Og
Te Og Assend
The Orientalisches traumlass
The Orient

かいないなれますはのなったままようよいので

To Messrs:

Company: Shisha Wholesalers

233 Eisenhower Lane S.

Lombard, IL 60148

USA

PHONE: 630-690-9000 630-599-1169 FAX:

From:

Dabes Egyptian Imports

Neuburgerstr. 109, 86167 Augsburg / Germany

To:

United States of America







WATERPIPES and accessories

ilem no	ctsn	packing rate	qty	price	anount
	84	1	504	US\$2,00	US\$11,592,00
AMY025			600	113 23,00	US\$13.800,00
AMY026	100		504	23,00	US\$11.592,00
AMY028	84	6			US\$10.578,00
AMY031	43	6	258	1	
AMY033	24	6	10		US\$5,904,00
MY035	33	6	C198	US\$41,00	US\$8.118,00
Ø)	30		1 120	U\$\$37,00	US\$6.660,00
NPC	30				
11 11/00 7	47	1	282	US\$26,00	US\$7.332,00
AMY027		4 500	2000	US\$1,00	US\$2.000,00
P06-06(Big adapter)		1	1500		US\$1.950,00
Small amy hose	15		1		US\$79,526,00
TOTAL	464	· · · · · · · · · · · · · · · · · · ·	6170		03379,320,00

TOTAL:

shipping cost

3800

total:

83,326,00

Please do not act

SAY USD

Bank Information:

Bank:

Benificialry:

BLZ:

IBAN:

E93700100800724682802

BIC:

PBNKDEFF

To Messrs: ALA ALABADI Company: World smoke shop 508 south brookhurest st. Anaheim. CA 92804

USA

PHONE: 0017143100776. 0017147744769 FAX:

From:

Dabes Egyptian Imports

Neuburgerstr. 109, 86167 Augsburg / Germany

United States of America

09, 10, 2013 Date: US0008_GE Involce: Payment:

and 1311.12 Our Mar

WATERPIPES and accessories

m no	COLOR	ctsn	packing	dr.	الا	orice	amount
			6	ļ	120	US\$22, 00	US\$2.640,00
	different color	20		 	1200	ODYED, NO	3333
AMY026							
AMTORO							
				ļ			1
			ļ;		60	US\$25, 00	US\$1.500; 00
	different color	10			-00	00020, 00	
			 	_			
AMY027		+					Y
		-	1				Y Y
						C	
	different color	10		4	60	US\$23 00	ÚS\$1. 320, 0
							L
· ·						\leftarrow	
AMA018	ļ	 			-6		
				1		\supset	
	different color	2	1	6	26	US\$44,00	US\$5. 544, C
ANY029	different color		1	1			
er stjern i de stiggener. Dit still de stidstelske de	diff. Color black shaft	2	5	9	150	US\$24, 00	US\$3, 600, 0
Аву 030	diff. Goldr Gladit errett						110000 010 0
	mix color	8		6	480	US\$43, 00	US\$20, 640, 0
NP_C			<u> </u>				
			Y		ćo	US\$22, 00	US\$1.320,0
Amy 025	diff. Color		0	в	60	03322,00	05011,020,0
		17 0	0	6	120	US\$44, 00	US\$5, 280, 0
	diff, Color		<u> </u>	`			
AMY031	MY.						
AMY - Hoo ka h	different do	1	.0	3	30	US\$55, 0	0 US\$1.650,
лыт — поо ка н							<u> </u>
						10001 5	0 11504 000
					1000	US\$4, 0	0 US\$4, 000,
(
hot pan							
not pan							
				+-			
				_	100	US\$5, C	0 US\$5, 000,
		_					
silikon tobacco howl							
Stitkon connece man							
					- 10	o uesor (00 US\$3, 000,
	different color		20	6	12	0 US\$25, C	JU USAS, 000,
						+	
AWY640							
						+	

	· · · · · · · · · · · · · · · · · · ·						
	ля¥650	differ color	20		12	0 US\$28, 0	0 US\$3, 360, 00
					ļ		
,		different color					
1		dinarant color	10	- 6	6	0 US\$47, 0	0 US\$2, 820, 00
-	Amy037			:			
}							
	<u> </u>			11000			
]	53 C	different color					
1.		Sittor CTIC COIOI		1000		US\$5, 00	US\$5, 000, 00
1 777	Silikon hoses		 		!)	
					()	
1 1 1 1 1 1					()	
Alu	+Glas handle set		+		(1	
			+		300	US\$5, 50	US\$1, 650, 00
Ac	ryl hondle set		+				US\$0, 00
			+		300	US\$4, 00	US\$1, 200, 00
Alur	alnum handle set		 				US\$0, 00
		·	+		400	US\$4, 50	US\$1, 800, 00
	Adapter big		 				US\$0, 00
			╅───┼		600	US\$2,00	US\$1, 200, 00
	Glas shaft		 				US\$0, 00
			 		100	US\$10,00	US\$1, 000, 00
Hot pa	an + tobacco bowl		 -				US\$0, 00
pan wit	h wood + tobacco	box1	 		1743	US\$4, 50	USS7, 843, 201
			 -		1340	US\$3, 50	US\$4, 69,
			, ,	i	ľ		

SAY USD Bank information: Benificialry: DLZ: IBAN: DIC:

10,00 10

Hesse doobèle 2 22.01.14

PROFORMA INVOICE

To Messrs: ALA ALABADI Company; World smoke shop 508 south brookburest st.

Anaheim. CA 92804

USA

PHONE: 0017143200776.
FAX: 0017147744769

From:

Dabes Egyptian Imports

Neuburgerstr. 109, 86167 Augsburg / Germany

To:

United States of America

Date:

14, 01, 2014 US_PROPODOQ_GE

Payment:

35_PR020209_GE T/T



F30 kg

F30 kg

F30 kg

F89295

LF&bee he

15.1.14

WATERPIPES and accessories

tem no	COLOR	etsn	packing rate	qty	Price/pcs	Total
•	different color		3	0	US\$8, 00	US\$24, (
AMY020						
		-				-
	different color		. 2	0	US\$11, 00	\(\s\\ \)22,
	dilletery color		4		03311,00	3,522,
АМУ027		+				<u> </u>
						· · · · ·
	different color		3	0		U\$\$24,
			-		2	
AMY028				C	/	
			1	V		
ANY029	different color	-	3	0	US\$12,00	US\$36,
			$\sqrt{3}$			
Л шу 030	diff. Color black shaft			0	US\$8, 00	US\$24,
NP_6	mix color	+.	6	0	US\$12, 00	US\$72,
1 005	18% O. C.		3	q	11000 00	tigagi
Amy025	diff. Color		- 3	(i	US\$8, 00	US\$24,
	diff. Color	\	3	0	US\$12, 00	US\$36,
AMY031						
	diff, Q or		3	. 0	US\$9, 00	US\$27,
АМҮ005	My.					
AMERICA A	dir Color		2	0	US\$8,00	US\$16,
AMY006						
АНҮ007	diff. Color		3	0	US\$10, 00	US\$30,
1201 (201	diff Cole			0	110014 00	pro e c -
АИУООВ	diff. Color		1	0	US\$14, 00	US\$14,
with case	diff. Color		2	0	US\$5, 00	US\$10,
AMYOO9						23,101
with case	diff. Color		2	0	US\$5, 00	US\$10,
AMYO14						
No.	diff. Color		3	0	US\$5, 00	US\$15,
AMY015						
ANYO18	diff. Color		3	0	US\$5,00	US\$15,
11010					- Naz-	
AMYO19	diff. Color		2	0	US\$12,00	US\$24,
All the state of t	diff. Color		2	0	US\$10, 00	US\$20, (

Alu+Glas handle set		.3 7.43	. 3	US\$1,00	US\$3, 00
uminum handle set TYP II	: 	73.9	2	US\$1,00	US\$2, 00
luminum handle set TYP I			2	US\$1,00	US\$2, GO
Aloryl bondle set TYP II		199	2	US\$1, 00	US\$2,00
Annual A. Al. (1990) 232				W001 00	
Acryl handle set TYP III			2	US\$1, 00	US\$2, 00
Any-033	different color		2	0 US\$12,00	US\$24, 00
4 P. H.					
		 	10	US\$1,00	US\$10, 00
			10	6331, 00	03310, 00
hot pan with wood handle					
					
			20	ES\$3,00	US\$60, 00
on tobacco bowl with hot					
					1
	black		5	US\$1,50	\$7,50
silikon tobacco bowl					
					,
			2	like on	US\$4, CO
GLAS SHAFT				1	0394, 00
			3	\$\$0,50	US\$1,50
1 1 1	~ ~~~		1	D	
glas handle long					
				Y	
	different color			US\$0, 80	US\$2, 40
	anteres in votor			0000,00	0502, 40
glas handle	· · · · · · · · · · · · · · · · · · ·	D	y		
		1	·		
LED		- () Y	8	US\$0, 50	US\$4,00
mouthpiece			10	US\$0, 50	US\$5, 00
ALWAHA CHARCOAL 3kg	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	"	20	US\$3,00	US\$60, 00
				2040,30	50,00,00
AMY CHARCOAL 0, 5kg	1/2		36	US\$1,00	US\$36, 00
		 			

US\$1.407,40

samples, value for customs purposes only

Bank information; Bank; Benificialry; BLZ; IBAN; BIC;

Postbank München Dabes Ibrahim 72010080 DE93700100800724682802 PBNKDEFF

			reference		·	
YMAO51			 	<u> </u>	 	
AMY022	diff, Color		2	0	US\$12,00	US\$24, 00
1.548444 · · · · · · · · · · · · · · · · ·	diff. Color		9	: 0	11224 00	Ueto on
AMY023	GIII. GOIGI			0	US\$4,00	US\$8, 00
	diff. Color		2	0	US\$14,00	US\$28, 00
AMYO35			 	<u> </u>		
AMY037	diff. Color		3	0	US\$14,00	US\$42, 00
	diff, Color		3	0	US\$5, 00	US\$15, 00
AMY069			ļ	ļ	00007110	00010, 00
AMY-156	diff. Color		2	0	U\$\$20, 00	US\$40, 00
100 - 12A						
AMY-159	diff. Color		2	0	US\$20, 00	US340, 00
.	diff. Color		2	0	US\$25, 00	US EQ O
AMY 200			<u> </u>		08420,00	7
	diff. Color		2	0	US\$25, 00	US\$50, 00
AMY-201						Y
AHY-340	diff. Color		3	0	(10 00)	US\$15, 00
	diff. Color		,,		US\$5, 00	HOA! # AD
AHY-340	dir, color		3		10530, 110	US\$15, 00
	diff. Color		3		US\$7, 00	US\$14, 00
AMY-440		_	-			
AHY-630	diff. Color			0	US\$9,00	US\$36, 00
All USO			V			
ANY-640	diff. Color		4	0	US\$9,00	US\$36, 00
	diff. Color		2	0	US\$11,00	US\$22, 00
AMY-650					504217.00	03424, 00
	diff. Color		4	0	US\$12,00	US\$48, 00
NPX			 			
id760a-1	diff. C. or		4	U	US\$5,00	US\$20, 00
	(dith C)Sior		4	Ú	US\$12,00	2012 10 121
NPX 💍	diffication		4		05312,00	US\$48, 00
	diff. Color		1	0	US\$11,00	US\$13,00
Amy-660						
AMY-MY SMOKE XL	diff. Color		25	0	US\$4, 00	US\$100,00
TOTAL STATE ALL	diff. Color					
AMY MY SMOKE	dill. Color		15	0	US\$3,00	US\$45, 00
	diff. Color		15	0	US\$1,00	US\$15, 00
AMY MY SMOKE CARTOMIZE	R					
NY MY SMOKE XL CARTOMIZ	diff. Color		3	0	US\$1,00	US\$3,00
BE CHAIDAIL					Dass ==	
Sleeve	diff, Color		4	0	US\$0,50	US\$2,00
	diff. Color		10	0	US\$0,50	US\$5,00
Silícon hose	Will. 50/0					

Name:				Deluxe		
Anschrift:				urger Str. 109 ' Augsburg		
Telefon:				0821/24297356		
Datum:		•	101	102 1/24297 330		
Datum.						
Wasserp	feifen					
AMY Deluxe						41
TO STATE A COMMUNICATION OF THE PROPERTY OF TH	Black Pearl			Preis ab 1 VPE	TOTAL CONTRACTOR AND	VPE
	Section of the sectio			pro Farbe	pro Parbe	
THU BH	Bestellnr. AMY-	009			Y	
	black			26,00€	23,00 €	8
	blue		mit Koffer	28,00	26,00€	6
4 3 3 5	red			CY	0.110 - 10	
	green			Y	Größe: 42 cm	
		and the second s	Andrew Commence of the Commenc			
	0 411			Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Sweet Harmo			pro Farbe	pro Farbe	
7	Silikonschlauch, Alu		1	proraine	protaine	
A Series Series To The Series	Bestellnr. AMY-	014	\ \ \ \	<u> </u>		
	1.0			25,00 €	19,00€	6
	red line		nit Koffer	31,00 €	25,00 €	4
	light blue		nitokollei	31,00 €	20,000	•
	black red		¥ —		Größe: 51 cm	
	dark blue				0,0,0,0,0,0	
- do any - constant and a second	and the second s			and the second s		
	Destiny	1		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Destiny		schlauch, Alu-Mu	ındetück	pro Farbe	pro Farbe	100000000000000000000000000000000000000
I I	Klicksystem, Silikol Bestellnr, AVY	MAE	Indistant	pro i di no	F	<u> </u>
Į	Desteilli. Alui	010				
Con American	black red white			26,00 €	23,00 €	6
	blue red white		-			
	dark blue					
	red with line				Größe: 50 cm	
W.	Crazy Shape	10 4 <u></u>		Preis ab 1 VPE	Preis ab 3 VPE	VPE
71	Kammersystem, Click-Ve		auch,	pro Farbe	pro Farbe	
To consequent	Alu-Mundstück	,				
Ž.	Bestellnr. AMY	-016-Click			[
1 % /	Destelling	0.00.0				
130	Desternit Aut			49,00 €	47,00 €	6

Größe: 65 cm

inkl. Silikonschlauch und Aluminiummundstück



Smoking De	luxe	Preis ab 1 VPE Preis ab 3 VPE	VPE
		pro Farbe pro Farbe	
Bestellnr. AM	/-017		
yellow	black with white	20,00 € 18,00 €	8
green white blac	k		
dark blue red wh	ite		
black red white		Größe: 52 cm	
red with white			



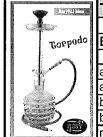
Candy		Preis ab 1 VPE Preis	ab 3 VPE VPE
		pro Farbe pi	ro Farbe
Bestellnr. Al	/IY-018		
amber	blue 2	20,00 €	19,00 € 6
amber 2	green		
purple			
black		Größe	49 cm
blue			Y



Spirit			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr.	AMY-019		(2)		
			~~~		
amber	blue 2		34,00 €	33,00 €	6
amber 2	green		ĊV		
purple		1	Image: Control of the		
black	·				
blue				Größe: 60 cm	



Princess			Preis ab 1 VPE	Preis ab 3 VPE	VPE
Klicksystem,Si	likonschlauch (	1	pro Farbe	pro Farbe	
Bestellnr. AN	1Y-021	D'			
		1			
amber	clear		41,00 €	40,00 €	4
amber 2	red				
black					
blue	M'				
blue 2				Größe: 70 cm	
			3.000 A		



Torp	edo		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Beste	llnr. AMY	-022			
amber		purple	41,00 €	39,00€	4
amber	2				
black					
blue					
red				Größe: 66 cm	

Rreis ab 3 VPE VPE pro Farbe

23,50 €

Größe: 50 cm

Preis ab 3 VPE

Größe: 56 cm

pro Farbe

25,00 €

6



Elementary		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AM	Y-023-2S			
	2 Anschlüsse	35,00 €	32,00 €	6
	mit Silikonschl.			
			Größe: 66 cm	

	Ž

Elementary		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AM	Y-023-4S			
	4 Anschlüsse	39,00 €	36,00 €	6
	mit Silikonschl.			
			S .	
			Gräßd: 65 cm	

	Junior			Preis
Junior <b>@</b>				pro
Y	Bestellnr. A	MY-025		
	amber	purple		(A)
[ <b>\</b>	amber 2			
	black		.1	V
	∖ blue			/
, 18 . r . J	red		77	

little princess	Little Princ	cess	KW	Preis ab 1 VPE	Preis ab 3 VPE	VPE
				pro Farbe	pro Farbe	
	Bestellnr. A	MY-026	$\Psi$			
		$\sim$		25,00 €	23,50 €	6
	amber	clear				
(	amber 2	red				
	black					1
	blue				Größe: 50 cm	
	blue 2	U			, , , , , , , , , , , , , , , , , , ,	

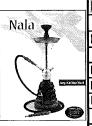
bady on fire	Lady on fire			Preis ab 1 VPE
Eddy Oil Jirk				pro Farbe
	Bestelinr. AMY	′-027		
	black green	2 Anschlüsse		28,00€
Tractor	black blue	mit Silikonschlau	ich	
150	black red			***************************************
2244				

VPE

6



Lady on fir	e	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. Al	MY-027			
		31,00€	30,00€	6
black green	4 Anschlüsse			
black blue	mit Silikonschlauch			
black red				
			Größe: 56 cm	



Nala		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
estellnr. AMY-028 lue black rown				
		25,00 €	23,50 €	6
blue black				
brown				<u> </u>
blue green				
			Größe 63 cm	



Nala mit K	lick-Verschluss	Preis ab 1 VPE	Préis ab 3 VPE	VPE
- HOSE AND ASSESSMENT OF THE SECOND OF THE S		pro Farbe	pro Farbe	
Bestellnr. A	stellnr. AMY-029	1 49°		
		3,00 €	51,00€	6
blue black	inkl. Silikonschlauch u.	59,00€	57,00€	6
brown	Acrylmundstück	<b>6 9</b>		
blue green		1 4		
		<b>A Y</b>	Größe: 70 cm	



7	Rough Diamond	KY	Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
l	Bestellnr. AMY-030				
			25,00 €	23,50 €	6
	brown				
	gray				
i	turquoise			****	
	purple			Größe: 50 cm	
1				and the second s	Treation of the latest



Rough Dia	Rough Diamond mit Klick-Verschl.		Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. A	MY-031			
		53,00€	51,00€	6
brown	inkl. Silikonschlauch u.	59,00€	57,00€	6
gray	Acrylmundstück			
turpuoise				
purple			Größe: 51 cm	



AMY ABS	SOLUT Größe: L	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr.	AMY-033-Klick-L			
mit Kammers	ystem, Silikonschlauch,Alumund	tück 65,00 4	€ 60,00€	6
amber	inkl. Silikonschlauch u.			
clear		1		
purple			Größe: 80 cm	
areen				



AMY ABSOLUT Größe: N			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr. A	MY-033-Klick-M	.,,,,,			
mit Kammersys	tem, Silikonschlauch,A	lumundstück	58,00€	55,00€	6
amber	inkl, Silikonschla	uch u.			<u></u>
					<u> </u>
clear					
purple				Größe 80 cm	
green					



AMY ABS	SOLUT Größe: S	Preis ab 1 VPE Préis ab 3 VPE	VPE
		pro Farbe pro Farbe	
Bestellnr.	AMY-033-Klick-S	(5)	
	ystem, Silikonschlauch,Alumur	dstück 46,00 € 46,00 €	6
amber	inkl. Silikonschlauch u		
clear		1 7	
purple		Größe: 70 cm	<u> </u>
green			



AMY Language	KV	Preis ab 1 VPE	Preis ab 3 VPE	VPE
992299999		pro Farbe	pro Farbe	
Bestellnr. AMY-037				
		55,00 €	52,00€	6
black				
red	4			
blue				
green			Größe: 71 cm	
			na sampan nangan na	



I need you	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	pro Farbe	pro Farbe	
Bestellnr. AMY-038			
mit Klicksystem, Silikonschlauch, Alu-Mundstü	ck <b>30,00 €</b>	28,00€	6
red			
orange			
green			<u> </u>
blue		Größe: 51 cm	<u> </u>

	Aero-X		Preis ab 1 VPE	Preis ab 3 VPE	VPE
JL	mit Klicksystem, Silikonschlauch,	, Alu-Mundstück	pro Farbe	pro Farbe	
	Bestellnr. AMY-039				
128			35,00 €	33,00€	6
	red				
	black				<u> </u>
	green			Größe: 71 cm	
	<b>5</b>		Preis ab 1 VPE	Preis ab 3 VPE	VP
	Dropwave		pro Farbe	pro Farbe	VÆ
1	Bestellnr. AMY-040		pro Farbe	pro raibe	
		uch Alu Mundetück	30,00 €	28,00 €	6
A TO	mit Kammersystem, Silikonschla	ucii, Alu-iviuliustuck	30,00 €	20,00 C	Ť
					T
				Größe Ogm	
					n or season with
	66-II-		Preis ab 1 VP€	Preis ab 3 VPE	VΡ
	Stella		pro Farbe	pro Farbe	
TIT	Bestellnr. AMY-041		PIOTO CO	pro raiso	<del>                                     </del>
	mit Kammersystem, Silikonschla	uch Alu-Mundstück	99,00 €	57,00€	1
AX	The Rammersystem, Chinosischia	idon, / lid Managadon			
			CY		
		4	1		
and the same				Größe: 0 cm	T

	AMY Primer	ab 1 Palette VPE
		1 Pal. = 200 KG
	Bestellnr. AMY-069	
		<b>22,00 €</b> 240
	1 VPE = 12 Stück	
	\(\frac{1}{2}\)	

	Big Snake	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	- NEW CONTROL OF THE PROPERTY	pro Farbe	pro Farbe	
F	Bestellnr. AMY-156			
	blue	63,00 €	55,00€	4
\	pink-kupfer			<u> </u>
	black			<u> </u>
	green		Größe: 65 cm	
			the same of the sa	ni anggaran andara



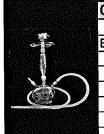
Royal	100	Preis ab 1 VPE	Preis ab 3 VPE	VPE
See September 1 Company of Section 1995 (September 1995)		pro Farbe	pro Farbe	
Bestellnr. AMY-159				
black	mit Koffer	59,00€	55,00€	3
blue				
pink red				
red			Größe: 85 cm	<u> </u>
white				



Glasshisha-SPACESHIP		Preis ab 1 VPE	Preis ab 3 VPE	VPE
mit Standfuß und LED		pro Farbe	pro Farbe	
Bestellnr. AMY-201_BS01				-
	mit Koffer	126,00 €	120,00€	1
	.,,		1	



Glasshisha-SATELITE		Preis a	ab 1 VPE	Rreis ab 3 VPE	VPE
		pro	Farbe	pro Farbe	
Bestellnr. AMY-202_BS08			100		
	mit Koffer		109,00€	99,00€	1
	1	<b>イマー</b>			l
	/_				
		)	-		



Glasshisha-GALAXY	K V	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AMY-203_BS0				
	mit Koffer	94,00€	89,00€	1
				_
		*		



Glasshisha-HELIX		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AMY-204_BS03				
	mit Koffer	109,00€	99,00€	1
Man				

(	Slasshisha- MOONRAKE	R	Preis ab 1 VPE	Topography and the property of	Vi
<b>a</b>			pro Farbe	pro Farbe	
	Bestellnr. AMY-205_BS02				_
		mit Koffer	116,00 €	110,00€	
- <b>从</b> -					
					L
The second secon					L
	Nachiska CUNCTORM		Project 4 VDE	Drain ah 2 VBE	<u> </u>
	Glasshisha-SUNSTORM			- ANIROGANISA-HIANE WINDSHIPPOR AND	v
更	Glasshisha-SUNSTORM   		Preis ab 1 VPE pro Farbe	Preis ab 3 VPE pro Farbe	v
更		mit Koffer		- ANIROGANISA-HIANE WINDSHIPPOR AND	V
更		mit Koffer	pro Farbe	pro Farbe	V

	Glasshisha-NEBULA		Preis ab 1 VPE	Rreis ab 3 VPE	VPE
_			pro Farbe	pro Farbe	
*	Bestellnr. AMY-207_BS06		157		
		mit Koffer	109,00€	99,00€	1
			GY		
					<u> </u>

	Glasshisha-STARFLIGHT	Preis ab 1 VPE	Preis ab 3 VPE	VPE
100		pro Farbe	pro Farbe	
4 j	Bestellnr. AMY-208_BS07			
	mit Koffer	156,00 €	149,00 €	1
protection process and the second				

	Glasshisha- ORBITAL		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	45-percent and a second and a second and a second as a		pro Farbe	pro Farbe	
	Bestellnr. AMY-209_BS05				
		mit Koffer	109,00€	99,00€	1
道					<u> </u>
					<u> </u>

	Little Zuri, schwarze Rauchsä	ule Preis ab 1 VPE	Preis ab 3 VPE	VPE
liccle Zuri		pro Farbe	pro Farbe	
ACC NO.	Bestellnr. AMY-340-b			
	black	17,00 €	16,00€	8
	blue			<u> </u>
	green		0. "0 - 40	
	red		Größe: 40 cm	
L	white		The second secon	

	Little Zuri, silberne Rauchsäule	Preis ab 1 VPE	Preis ab 3 VPE	VPE
little Zuri		pro Farbe	pro Farbe	
	Bestellnr. AMY-340-s			
	black	17,00€	16,00€	8
	blue			<u> </u>
14 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	green			
	red		Größe: 40 cm	
	white			

Stillness	Stillness		Preis ab 1 VPE	PARTIES AND	VPE
_1	Samuel Commission of the Commi		pro Farbe	pro Farbe	
3.69410 mi	Bestellnr. AMY	-440	167		
No.	blue red white	blue line	18,00€	17,00 €	6
	red white	black with red	CY		ļ
	black white	black with blue			
	black milk	blue white	AUCH MIT SCH		
	black red white	yellow	RAUCHSÄULE V	/ERFÜGBAR	
	black with green	dark blue			<u> </u>
	red	light blue	<u> </u>		<u> </u>
	black	green		Größe: 48 cm	
	black blue Frost		<u> </u>		<u> </u>
	black red Frost			A STREET OF THE PROPERTY OF TH	
	The state of the s				

	DIGON TO GITTE		1			
	Little Volcano			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			9/39/2000 Albania (1990)	pro Farbe	pro Farbe	
	Bestellnr. AMT	<b>5</b> 0				<u> </u>
	Kammersystem, Siliko		Mundstück	32,50 €	29,50 €	6
	S	haft: Power P	owder			
	re	ed				
	gr	een				
	bl	ue			Größe: 48 cm	<del> </del>
	bl	ack				

	Small Rips			Preis ab 1 VPE	Preis ab 3 VPE	VPE
X	Oliza (Bioli Media ) oliza (Carallel Carallel )			pro Farbe	pro Farbe	
	Bestellnr. AM	Y-470				
N X	Kammersystem, S	Silikonschlauch,	Alu-Mundstück	30,90 €	28,50 €	1 6
MEN		Shaft: Power Powder				<u> </u>
		red				
		green				
		blue			Größe: 48 cm	ļ <u>.</u>
		black				

Preisliste Wasserpfeifen Seite 9 von 68



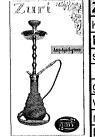
Glorious		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	(S)(C)(T)(T)(S)(S)(T)(T)(S)(T)(T)(S)(T)(T)(T)(T)(T)(T)(T)(T)(T)(T)(T)(T)(T)	pro Farbe	pro Farbe	}
Bestellnr. AMY	-630-n-1			
blue red white	blue line	33,00 €	29,00€	6
red white	black with red	mit Silikonschla	uch + Alumundstü	ck
black white	black with blue		<u></u>	
black milk	blue white		<u> </u>	
black red white	yellow	AUCH MIT SCH		
black with green	dark blue	RAUCHSÄULE V	/ERFÜGBAR	
red	light blue			<b>↓</b>
black	green		Größe: 71 cm	ļ
black blue Frost				
black red Frost				



Glorious 4 S	mokers	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	2.23 (1) (2) (3) (3) (3) (3) (3) (3) (3) (3) (3) (3	pro Farbe	pro Farbe	
Bestellnr. AMY	-630-n-4			
			Y	
blue red white	blue line	36,00 €	33,00 €	6
red white	black with red	^	<b>Y</b>	
black white	black with blue		, ,	
black milk	blue white	AUCH MIZ SO HV	VARZER	
black red white	yellow	RAUCHS AUDE V	/ERFÜGBAR	
black with green	dark blue			<u> </u>
red	light blue			ļ
black	green	45′	Größe: 71 cm	
black blue Frost				
black red Frost		<u> </u>	No consequence of the second o	



Zuri. schw	arze Rauchsäule	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	ikonschlauch, Alu-Musostüsk	pro Farbe	pro Farbe	
Bestellnr. Al			<u></u>	
schwarze Rau	chsäule	36,00€	32,00 €	6
	(X)Y			ļ
green	black with red			<u> </u>
red	block with blue			
blue	white		Größe: 71 cm	<u> </u>
blue black	veilow			



Zuri, silberne Rauchsäule	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
Bestellnr. AMY-640-s-1			
silberne Rauchsäule	36,00 €	32,00 €	6
			<u> </u>
green			ļ
white			
red		Größe: 71 cm	
black			



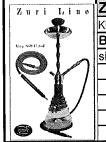
Zuri 4 Smokers, silberne Rauchs. Klicksystem, Silikonschlauch, Alu-Mundstück		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AMY-650-s-1				
silberne Rauchsäule		40,00 €	38,00€	6
black			200	ļ
green				
white			Größe: 71 cm	,
blue				



Zuri 4 Smokers, schwarze Rauchs.	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
Bestellnr. AMY-650-b-1			
schwarzer Rauchsäule	40,00 €	38,00 €	6
black			
green			
white		Größe. 71 cm	ļ
blue			<u> </u>



Zuri Line, schwarze Rauchs.	Preis ab 1 VPC Preis ab 3 VPE	VPE
Silikonschlauch, Alu-Mundstück	pro Farbe pro Farbe	
Bestelinr. AMY-660-b	(5)	
schwarzer Rauchsäule	36,00 € 34,00 €	6
	, G ^y	
	Größe: 71 cm	



Zuri Line, silberne Rauchs.	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
Bestellnr. AMY-660-c			
silberne Rauchsäule	36,00 €	34,00 €	6
N			
Y		Größe: 71 cm	
C			



Zuri Line, goldene Rauchs.	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
Bestelinr. AMY-660-g	36,00 €		
goldene Rauchsäule		34,00 €	6
			ļ
		Größe: 71 cm	ļ

				000
	Big Rips	Preis ab 1 VPE	CONTRACTOR OF THE PROPERTY OF	VPE
_7_	Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	****
T	Bestellnr. AMY-680			
100		36,00 €	33,00 €	6
III V				
2			Größe: 71 cm	
U				
	Cityscape	Preis ab 1 VPE	Preis ab 3 VPE	VPE
<b>T</b>	Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
	Bestellnr. AMY-690			
		35,00 €	33,00€	6
NX			· · · · · · · · · · · · · · · · · · ·	
				$\vdash$
			Größe. 71 cm	
			CIOISP. TOTAL	
	Crazy Dots	Preis ab 1 VP€	Preis ab 3 VPE	VPE
y Dotsa.	Clazy Bots	pro Farb	pro Farbe	
<b>Y</b> :	Bestellnr. AMY-760	157		
		14,00€	12,00€	12
				1
			0.40	<del>                                     </del>
		<del> </del>	Größe: cm	├
arangganandanan arangganan	Jupen Brees	Preis ab 1 VPE	Preis ab 3 VPE	VPE
7	HPCB, Brass Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	1 9 7 n 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Bestellnr. HPCB-001	pro ruibo	p.o., a	
	Bestellini, tir OB-001	65,00€	63,00 €	6
INV				
				ļ
	y		Größe: 71 cm	
			the control of the co	
2200		- : : : : : : : : : : : : : : : : : : :	Inih 2.VDE	VPE
7	HPCB, Brass	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
4	Bestellnr. HPCB-002	65,00 €	63,00 €	6
	) <del>                                    </del>	00,00 €	30,03 €	+
	/			
121				
			0 "0 74	

Preisliste Wasserpfeifen Seite 12 von 68

Größe: 71 cm



HPCB, Twist	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Klicksystem, Silikonschlauch, Alu-Mundstück	pro Farbe	pro Farbe	
Besteilnr. HPCB-003			
	65,00€	63,00 €	6
		Größe: 71 cm	



0.0	Preis ab 1 VPE	Preis ab 3 VPE	VPE	
HPCB, Heavy Shay Klicksystem, Silikonschlauch, Alu-Mundstück			pro Farbe	
	65,00 €	63,00 €	6	
		$\sim$		
		Größe: 1 cm		
	dundstück	fundstück pro Farbe	65,00 € 63,00 €	



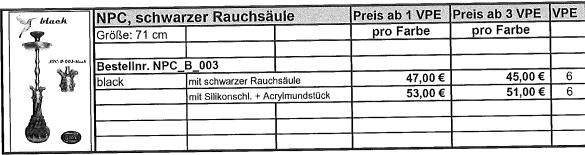
NPC, silber	ne Rauchsäule	е	Preis a	ab 1 VP€	Préis ab 3 VPE	VPE
Größe: 71 cm			pro	Farbo	pro Farbe	
				<b>45</b> 7		
Bestellnr. NP	C_S_001		_^^	<i></i>		
grün	mit silberner Rauc	mit silberner Rauchsäule		⁷ 47,00€	45,00 €	6
orange	mit Silikonschl. + Ac	rylmundstück	15	53,00€	51,00€	6
darkblue			7			
red		4	<b>\</b>			
			<b>7</b>			



NPC, schwa	arzer Rauchsätte 🗸 📉	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Größe: 71 cm		pro Farbe	pro Farbe	
Bestellnr. NP	C_B_004			
black	mit schwarzer Rauchsäule	47,00€	45,00 €	6
black white	mi Silikonschl. + Acrylmundstück	53,00€	51,00 €	6
	My			
16	) >			



NPC, silberne Rauchsäule		Preis ab 1 VPE	Preis ab 3 VPE	VPE		
Größe: 71 cm			pro Farbe pro Farbe	pro Farbe	pro Farbe	
Bestellnr. NP	_  C_S_003					
green	mit silberner Rauch	mit silberner Rauchsäule		45,00€	6	
blue	mit Silikonschl. + Ad	mit Silikonschl. + Acrylmundstück		51,00€	6	
red						



Mack white	NPC, schwa	rzer Rauchsä	ule	Preis ab 1 VPE		VPE
4.	Größe: 71 cm	520		pro Farbe	pro Farbe	
J7K-057-Hand Late	Bestellnr. NPC	B 004				
	black white	mit schwarzer Rauch	säule	47,00 €	45,00 €	6
W a		mit Silikonschl. + Acı	ylmundstück	53,00€	51,00€	6
And a						

Amy Deluxe	NPX mit A	AMY DELUXE	72	Preis ab 1 VP	Préis ab 3 VPE	VPE
AIII) DOTANG		hlauch + Alu-Mundsti	ück	pro Faxo	pro Farbe	
				1 17		
JE-MA-BIX9H	Bestellnr.	NPX_S_AM				<u> </u>
1	rot	mit silberner Ra	uchsäule	44,00€	39,00€	6
<b>Y</b>	blau			15'		ļ
	orange					-
			1	<b>Y</b>		-
7770	Bestellnr. I	NPX_B_AM	<b>* *</b>			<u> </u>
	rot	mit schwarzer F	Rauchsäule	44	39	9 6
	blau		KYY		2 10 74	
	orange		J.Y.		Größe: 71 cm	
	The second secon					

Butterfly	NPX mit Butterfly	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Dutterity	mit Silikonschlauch + Alu-Wandstück	pro Farbe	pro Farbe	
NAX-B-BRASI	Bestellnr. NPX S BU	44.00 €	39,00€	6
	pink mit silberner Rauchsäule			
	purple			-
	Bestellnr. NPX_B_BU	44,00 €	39,00€	6
	pink mit schwarzer Rauchsäu	le		
	purple		Größe: 71 cm	

Scorpion	NPX mit S	Scorpion	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		hlauch + Alu-Mundstück	pro Farbe	pro Farbe	
beenses	Bestelinr. N	IPX S_SC			
)	rot	mit silberner Rauchsäu	ıle 44,00 €	39,00€	6
	orange				-
	Bestellnr. I	NPX_B_SC	44,00€	39,00€	6
	rot	mit schwarzer Rauchs	äule		
The second secon	orange			Größe: 71 cm	

Preisliste Wasserpfeifen Seite 14 von 68



NPX mit Sp	oider	Preis ab 1 VPE	Preis ab 3 VPE	VPE
mit Silikonschlauch + Alu-Mundstück		pro Farbe	pro Farbe	
Bestellnr. NP	X_S_SP	44,00 €	39,00€	6
rot	mit silberner Rauchsäule		No.	
blau				
orange				
Bestellnr. NP	PX_B_SP	44,00 €	39,00€	6
rot	mit schwarzer Rauchsäule	9		
blau				
orange			Größe: 71 cm	<b>.</b>

Unique		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. S	S01			
•		72,00 €	71,00 €	6
mit Silikonschlauch und Aluminiummundstück			$\langle \mathcal{N} \rangle$	
		4	~ ~	ļ
				<u> </u>
			Größe: 71 cm	
			¥	



				THE RESERVE TO SERVICE OF THE PARTY OF THE P
Style Steel		Preis ap VPE	Preis ab 3 VPE	VPE
		Txo Farbe	pro Farbe	
Bestellnr. S_S02		(5)		
	4	73,00€	69,00 €	6
mit Silikonschlauch und Alum	iniummundstück	\ <b>&gt;</b>		
	<b>A S</b>	/		
	KYY		Größe: 71 cm	
				İ



	Attend	The state of the s		
Maestro	$\sim \sim \sim$	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. S_S0	3			
*	7	73,00€	69,00 €	4
mit Silikonsçh aud	h und Aluminiummunds	stück		
			Größe: 71 cm	
				1



	*389000000000000000000000000000000000000
26,00 €	6
Größe: 71 cm	

## Schläuche

	AMY-Schlau	ch	100	Preis ab 1 VPE	Preis ab 3 VPE	VPE
				pro Farbe	pro Farbe	
	Bestellnr. S19	3		2,20 €	1,60 €	20
	ohne Aufdrucl	k am Griff: 17	0 cm			
						<u> </u>
	rot	braun				<del></del>
	grün	schwarz				
	blau			Emilian and the state of the st		

	AMY Schl	auch aus Silik	on	Preis ab 1 VPE		VPE
				pro Farbe	pro Farbe	<del>                                     </del>
	Bestellnr. S	 3197		3,20 €	2,90€	25
			mit Sleeve	6,50 €	)6,00 €	25
	blau	transparent			,	
	grün	silber	neon-pink			
	schwarz	rot	neon-grün		\ <u>'</u>	-
	gelb		neon-blau			

у.	AMY Delu	xe Schlauch		Preis.	APE	Preis ab 3 VPE	VPE
	uni			Aro	Parbe	pro Farbe	
Continue C				SY			
	Bestellnr. S	200			6,50 €	6,00 €	36
			4				
	schwarz	violett					
	blau	weiß		<u> </u>			<u> </u>
	grün			<u> </u>			
The same of the sa	pink						

36
1 26
30
<del> </del>
1_

	AMY Schl	auch 170 cm	Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	<u> </u>
	Bestellnr. S	S207	2,00 €	1,80 €	10
	schwarz	rot			
	blau	gelb			├
	orange				<u> </u>
	lila			and the second s	

Preisliste Wasserpfeifen Seite 16 von 68



AMY Deluxe Aluminiummundstück			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr.	S208		6,50 €	6,00€	20
TYP II		inkl. Silikonschl.	9,40 €	8,40 €	20
rot	blau	<u> </u>			
pink	grün				<u> </u>
silber	schwarz				1

AMY Deluxe Aluminiummundstück		Preis ab 1 VPE	Preis ab 3 VPE	VPE	
			pro Farbe	pro Farbe	
Bestellnr.	 S208-M1		6,50 €	6,00 €	20
TYP II		inkl. Silikonschl.	9,40 €	8,40 €	20
rot	blau				
pink	grün				
silber	schwarz				



AMY Deluxe Aluminiummundstück			Preis ab 1 VP	E	Preis ab 3 VPE	VPE
			pro Faxbe	7	pro Farbe	
			(5°			
Bestellnr.	S209		6,50	€	6,00 €	20
TYP I		inkl. Sillkonschl.	9,40	€	8,40 €	20
			45			
rot	blau	<u> </u>				
pink	grün	<b>1</b>				
silber	schwarz	<b>—</b> * * * * * * * * * * * * * * * * * * *				

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AMY Delux	xe Big Adapte		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	- 2	Y'			
Bestellnr. S	210		2,90 €	2,50 €	50
silber	silver matt	anthrazit matt			
schwarz	warz matt				
gold	schwarz pmb				



AMY Del. Universal Big Adapter		Preis ab 1 VPE	VPE
Bestellnr.	5210-uni	5,90 €	50
silber	gold		
schwarz			

Preisliste Wasserpfeifen Seite 17 von 68



AMY Deluxe Acryl Mundstück		Preis ab 1 VPE	Preis ab 3 VPE	VPE	
Alli Dola	, , , , , , , , , , , , , , , , , , ,		pro Farbe	pro Farbe	
Bestellnr. S	215		6,00€	5,50 €	50
TYP II	210	inkl. Silikonschl.	8,90 €	8,40 €	50
schwarz	orange				
blau	transparent				<u> </u>
rot	silber				
pink	grün			and the second s	

c-management of the comment	Ice-Bazooka	mit Kühlakku		Preis ab 3 VPE	VPE
	ICE-BUZOOKE		500 AST 750 AS	pro Farbe	
	Bestellnr. S	216-Akku		4,50 €	
	gelb	blau			<del> </del>
	grün	weiß			<b>-</b>
	neon-pink			 	

	AMY Delux	e Acryl Munc	lstück		Préis ab 3 VPE	VPE
	ohne Logo			pro Farbe	pro Farbe	ļ
				(S)	4 4	
100	Bestellnr. S2	17		5,00€	4,50 €	50
	TYP III		inkl. Silikonschlaud	7,90€	7,40 €	50
	blau	rot		(Sy		
	grün	transparent		\ <u> </u>		
	orange			<b>Y</b>		
	pink			and the second s		Secretary and the second

	Endstück für Silikonschlauck	Preis ab 1 VPE	Preis ab 3 VPE	VPE
				<b>-</b>
			0.70.6	100
	Bestellnr. S218	0,90€	0,70 €	100
				╁
(10)				

Managa and a segment of the segment	Schlauchdichtung	 Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. S219-S	0,20 €	0,15€	50
				+
				╄

Preisliste Wasserpfeifen Seite 18 von 68

Tabaktopfdichtung	P	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Bestellnr. S219-T		0,40 €	0,25 €	50

		800	
V	A	Far Stand	TIM.
		20"51	8
		2000	ZXD
ĺ,	V	h i	
		88	3848
			rummumeri etz

AMY-Alu-Glas-Mundstück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Bestellnr. S220	6,30 €	5,80 €	100
schwarz	· ·		
blau		$\wedge$	
grün		1	
	•		l

A	AMY-Glasrauchsäule	Preis ab 1 VP€	Preis ab 3 VPE	VPE
Que.			<b>&gt;</b>	
	Bestellnr. S221	1,50 €	9.90 €	80
		71,500	3,50 €	- 00
	transparent	15'		
Mil		$\lambda$		

4	AMY Glasmundstück XXL	Preis ab 1 VPE	Preis ab 3 VPE	VPE
¥ •				ļ
	Bestellnr. S222	13,50 €	12,90 €	100
	transparent			
Z*				<del> </del>

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(~)	I	<b>5</b>

AMY Acrylmundstück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Bestellnr. S223	3,00€	2,50 €	180
grün			
blau			
rot			
clear			

						00
6	AMY-Glasrau	ıchsäule	in the	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. S300			15,00€	12,00€	<u> </u>
C.	silberne Ansch	lüsse		·		
	schwarze Ansc	hlücco				
	SCHWAIZE AUSC	illusse				ļ
monthy in the contract of the						
Million March Calebra com a participa de la companya de la companya de la companya de la companya de la company	AMY-Glasrau	icheäulo		Preis ab 1 VPE	Preis ab 3 VPE	VPE
© ₃	AW I-Glasiac	Clisaule		Piels an i VPE	Preis au 3 VPE	VFE
	Bestellnr, S300			13,50 €	12,80 €	
·6	silberne Ansch	lusse				
•	schwarze Ansc	hlüsse				
				<u> </u>		Sector (Inches)
	AMY-Glasmu	ndstück		Preis ab 1 VPK	Preis ab 3 VPE	VPE
A Glas-	Bestellnr. S225			13,50 €	12,90 €	100
Amy \$225	200101111111111111111111111111111111111				12,50 C	100
5 stück			1	Į.		
80			<u> </u>			
			AY			
	AMY Alumini Größe 40,5 cm T	um Mundstü VP 3 mit Silikan	CK M	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Große 40,5 cm 1	THE STREET	gomauch olee			
	Bestellnr, S230	NY.		8,90 €	8,50 €	100
		Ch.				
		) ′				
	AMY Alumini	um Mundstü	ck XL	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Größe 45,0 cm T	mann were a second street of the second of the second	had were to be the transfer of the first server and the heart of the server of		green greet welch tet is it is to the country to the little of the state of the little	
_	Bestellnr. S231		SEPONE SERVICE SERVICES SERVIC	0.50.6	0.50.5	100
	Desteinr. 5231			9,50 €	8,50 €	100
			7			

						00
	AMY Alu-Mund	istück schrau	bbar Typ 6	Preis ab 1 VPE	Preis ab 3 VPE	VPE
ı	Bestellnr. S23	2		5,50 €	5,00€	100
	schwarz					
	rot					
	silber					
androny propertions are all the state posterior and state are		and the second s				
	AMY Alu-Mune		bbar Typ 6		Preis ab 2 VPE	VPE
	inkl. Silikonsch	lauch				
	Bestelinr. S23				5,80 €	48
(AMY)						
	lila	schwarz	weiß			
	pink	transparent	orange		<del>                                     </del>	<del> </del>
	rot	grau	grün		- X Y	
ners til men styren som en former som en geggen som en men	braun	dunkelblau				
	AMY Alu-Mu	ındstück Ty	p 5	Preis ab 1 VP	Preis ab 3 VPE	VPI
					7	<u> </u>
				12	0.00.5	-
	Bestellnr. S23	33		4,00 €	3,80 €	80
						+
				<del>1</del>		╁
						1
			1	<del>}</del>		
- announced and the second and the s						01688888
		dstück schra	ubbar Typ 5	Preis ab 1 VPE	Preis ab 3 VPE	VP
	inkl. Eisstift	1	$\mathcal{V}'$		<del>                                     </del>	+
n				4.00.6	4,00 €	8
A	Bestellnr. S2:	33+Eis		4,20 €	4,00 €	1 0
0,4,0						+
-,		X			<u> </u>	+
	—— <i>(</i>				<del></del>	+-
		<u> </u>				1
garante al la consequence de contra y en estado	AMY Alu-Mur	ndstück schra	ubbar Typ 5	Preis ab 1 VPE	Preis ab 3 VPE	VP
THE VALUE OF	mit Kugel Des	ign inkl. Eisstif	t			
						_
	Bestellnr. S2	33+Eis-AM-4		5,50	5,80 €	8
						-
M // H				<b>\</b>	Į.	1

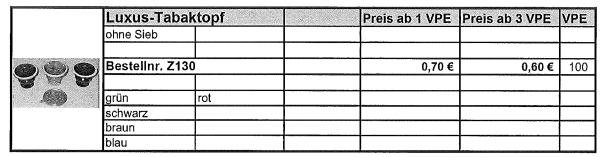
Preisliste Wasserpfeifen Seite 21 von 68

	AMY Alu-Glas-Mundstück M4	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	inkl. Silikonschlauch (sleeve)			
	Bestellnr. S234	8,50 €	8,20 €	80

	AMY Wasserpfeifen-Taschen-Set	Preis ab 20 Stück	VPE
	(4 Stück)		-
DISAMY E	Bestelinr. T100	25,00€	4
		(A)	
		A Y	

COMMERCIALLY SERVED

# Tabaktöpfe



	AMY-Tab	aktopf tief mit AMY-Logo	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr.	7440	4 20 6	0.00.6	100
	besteim.	2140	1,30 €	0,90 €	100
	weiß	grün		127	
	rot	schwarz			
	braun			7	
	blau		4	<b>)</b>	

	1-Loch-Tabaktopf	Preis ab 3 VPE   Preis ab 3 VPE   VP	Έ		
	Bestellnr. Z141	1,50 € 1,20 € 10	00		
	schwarz				
	blau				
	rot				

	Tabaktopf Jo	ordan 🔨 📉	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		4			
	Bestellnr. Z142		1,20 €	0,80 €	100
		>			
	rot	blau			
\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	rosa Schwarz				
	arün		,		

						00
	Tabaktopf Al	MY-Deluxe, 8	Löcher	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z145	5		1,80 €	1,50 €	100
	schwarz	rot				<u> </u>
		100				
	blau		+			
	grün		,			
	gelb	and the second s				
romanos mente <mark>em mono contractoro sono Specimo Successivo de Cond</mark> essivos	Tabaktopf m	nit mittigem Z	Zylinder	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	***************************************					┼
	Bestellnr. Z146	6		1,30 €	0,90€	100
	10	grün				<u> </u>
	weiß					<b>†</b>
=	rot	schwarz				+
	braun				+ 2 > -	+-
	blau		The second secon	American representatives of the contract of th		
and the second superior and the second superior of the second superior supe				In about Vipe	Preis ab 3 VPE	VPI
_	Tontabaktor	<u>pf</u>		Preis au i vy	Mels au C 31 -	V
7	٦			+	1	+
Tontopf				1 2001	4 00 6	100
7	Bestellnr. Z20	0		1,20 €	1,00€	10
77		T		<b>X</b> Y'		—
9						
			+			$\mathbb{L}_{-}$
		+	+			Τ
			+ , ~	<del>)   </del>		$\top$
	<u></u>		1.			
nagy the and the second and the seco	In the table		K V	Drais ah 1 VPF	Preis ab 3 VPE	VP
	Naturtabakt	.opt		PIGIS QUITE	DIVISIA PROPERTY AND ADDRESS OF THE PROPERTY O	B. Saggen.
		+	$\overline{\Psi}$			+
1	<u> </u>			170/	€ 1,50 €	€ 10
/	Bestellnr. MD	006		1,70 €	1,00 -	+ '-
						4-
		1				4_
	<del>                                     </del>	N				4_
	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	1			T	
		<del></del>				
me.				Account to the second s	A STATE OF THE PARTY OF THE PAR	and the same
	Naturtabak	topf		Preis ab 1 VPE	Preis ab 3 VPE	VP
	3725-9037 state of 2000s					+
4.00	0					4
	Bestellnr. MD	1007		1,70	€ 1,50 €	€ 10
	D0000	<del></del>				~I
						$\top$
						+

Preisliste Wasserpfeifen Seite 24 von 68

						000
<u> </u>	Naturtabaktop	f l		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			,			
	Bestellnr. MD008	}		1,70 €	1,50 €	100
	Desteilli. MD000	,				
			,			
Dancanago espaís de la Colonia de			All and the figure of the control of	gginternational accountry, since any experience of high contracts around the abstract to the contract of the c	and the second	a piranesa caracteria
				n : 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Preis ab 3 VPE	MOE
	Naturtabaktop	)Î		Preis ab 1 VPE	Preis ab 3 VPE	VPE
						100
	Bestellnr. MD009	9		1,70 €	1,50 €	100
					(2)	
			and the state of t			19pris West
	Naturtabaktop	)f		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		H (DONNY) O COLO HALL THE SAME OF THE COLO HALL THE COLO H		457		
	Bestellnr.052			1,70 €	1,50 €	100
	Desterminos	-		(A)		
	-		1	<b>-</b>		
			4			
1						<del>                                     </del>
		Andrews and Andrews (1977)		The second secon	A STATE OF THE STA	and the second second
Name of the second seco		4 1 - 14 - 4		Desir of AVDE	Preis ab 3 VPE	VPE
	1-Loch Siliko	ntabaktoni		Preis ab 1 VPE	Preis ab 3 VPC	VFE
						<del> </del>
		Y		0.00.6	6006	25
	Bestelinr. Z202-	110000		6,30 €	6,00 €	25
						<del> </del>
((3))		) yld		\		
		silber	163			
	neon-pink		10230			+
	neon-blau					nn dynastic (Viewnon)
	Tall and Oller	ntobolitons		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	7-Loch Siliko	паракторт		LIGIS AD I VEE	I TEIS AD S VEE	7.5
						+
	D - 4-11 - 7000	71		6,30 €	6,00 €	25
	Bestellnr. Z202-	TIOCH		ე ნ,ა∪ €	0,00€	25
of the same		1.1				+
&( <b>(C</b> 3))		gold		\ <u> </u>		+
		silber		<i>-</i>		
1	neon-pink			<del>-</del>		1 -
	neon-blau					

Bestellnr. Z203						000
Head Pot   Preis ab 1 VPE   Preis ab 3 VPE   VP    Bestellnr. Z204   mit Tabaktopf   4,50 €   4,00 €   10    Preis ab 1 VPE   Preis ab 3 VPE   VP      Preis ab 1 VPE   Preis ab 3 VPE   VP   VP      Preis ab 1 VPE   Preis ab 1 VPE   Preis ab 3 VPE   VP      Preis ab 1 VPE   Preis ab 3 VPE   VP   VP   VP   VP   VP   VP   VP		Hot Pan		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Head Pot		Bestellnr. Z203				120 120
Bestellnr. Z204 mit Tabaktopf 4,50 € 4,00 € 10  Head Pot mit Holzgriff Preis ab 100 Stück VP  Bestellnr. Z204-holz mit Tabaktopf 4,00 € 3,50 € 10  LED, groß mit Fernbedienung Preis ab 7 VPE VF  Bestellnr. Z205 groß 6,00 € 1  1 VPE = 4er Bliste verpackung			Sillkontabaktopt			
Head Pot mit Holzgriff  Preis ab 100 Stück  180 Stück  VP  Bestellnr. Z204-holz  mit Tabaktopf  A,00 € 3,50 € 1  LED, groß mit Fernbedienung  Preis ab 7 VPE VF  Bestellnr. Z205 groß  1 VPE = 4er Blist verpackung	And the second s	Head Pot		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Head Pot mit Holzgriff  100 Stück  180 Stück  VP  Bestellnr. Z204-holz  mit Tabaktopf  4,00 €  3,50 €  1  LED, groß mit Fernbedienung  Preis ab 7 VPE  Bestellnr. Z205 groß  1 VPE = 4er Bliste verpackung		Bestellnr. Z204	mit Tabaktopf	4,50 €	4,00 €	100
Head Pot mit Holzgriff  100 Stück  180 Stück  VP  Bestellnr. Z204-holz  mit Tabaktopf  4,00 €  100 Stück  180 Stück  VP  A,00 €  100 Stück  180 Stück  VP  A,00 €  100 Stück  1					(V)	
LED, groß mit Fernbedienung  Preis ab 7 VPE  Bestellnr. Z205 groß  1 VPE = 4er Blisttryerpackung	1	Head Pot mit Holzgriff				VPE
Bestellnr. Z205 groß  1 VPE = 4er Blisterverpackung	T	Bestellnr. Z204-holz	mit Tabaktopf			
Bestellnr. Z205 groß  1 VPE = 4er Blisterverpackung						
Bestellnr. Z205 groß  1 VPE = 4er Blisttryerpackung						Type
1 VPE = 4er Blisterverpackung		LED, groß mit Fernbec	dienung		Preis ab / VPE	VPE
Preis = pro einzense stuck		1 VPE = 4er Blisterverpac	kung		6,00 €	4
		Preis = pro einzensa stuck				
LED, Mini Preis ab 100 VPE VI		LED, Mini			Preis ab 100 VPE	VPE
Bestellnr. Z205 mini 1,40 €  1 VPE = 10er Blisterverpackung	411 <b>4</b>	Bestellnr. Z205 mini	ackung		1,40 €	€ 10

Preis = pro einzelnes Stück

					000
K	AMY Hot Screen - Set		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	inkl. Naturtabaktopf				
	Bestellnr. Z206	mit Natur-Tabaktopf	7,40 €	7,00€	100
	AMY Hot Screen BIG		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z206-BIG		7,30 €	6,50 €	100
				( <del>\)</del>	
	AMY Long Lasting 2 x 1 l	klein	Preis ab 1 VP€	Préis ab 3 VPE	VPE
			\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		
Long Lasting 2x1	D = 4 = 11 = 2040				
-1-	Bestellnr. Z210		14,50 €	12,50 €	
			1 5 1-1,00°C	12,000	
			7		
		1 × ×			m teneramen (visiter) ten sevisi
estas angue in dimension a can sentembro a can	AMY Long Lasting 3 x 1	aport	Preis ab 1 VPF	Preis ab 3 VPE	VPE
	Ann Long Lasting 5 x 1	37 37	1.00002.002		
tong tasung 3x1					
	Bestelinr. Z211			18.40.5	
			19,00 €	17,00 €	
_62					
				1	<b>†</b>

## Zubehör

Zubelloi						
and the second s	Kohlezange			Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Edelstahl Bestellnr. Z112			2,00 €	1,50 €	20
	Hammerzang	je		Preis ab 1 VPE	Preis ab 3 VPE	VPE
3	Bestellnr. Z116			2,30 €	1,80 €	20
						A CONTRACTOR MINES
	AMY-Kohleza	ange		Preis and VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z117			1,50 €	1,20 €	20
al.			N. C.			
	Luciono Mun			la - : La Vae	Desir als OVDE	Wor
	Hygiene-Mur	idstucke 🔨		Preis ab 1 VPE	rreis ab 3 VPE	VPE
À	Bestellnr. Z126			3,00 €	2,00 €	10
	1 VPE = 1 Beu of 1 Beutel = 00 St	ück				
	AMY Hygiene	-Mundstück	e, lang	Preis ab 1 VPE	Preis ab 16 VPE	VPE
	Bestellnr. Z127 1 VPE = 100 Beu	tel		2,00€	1,00 €	100
	(1 Beutel = 100 S	tuck)				

						000
	Kohlesieb			Preis ab 1 VPE	Preis ab 3 VPE	VPE
•			mary mary market and a second			
/45B	Bestellnr. Z129			0,70 €	0,50 €	50
	Kohlesieb Luxus					
	Burner			Preis ab 1 VPE	Preis ab 3 VPE	VPE
No a way.	Bestellnr. Z193			1,00€	0,60 €	12
	Anzünder					
						-
e Sometime statement of the statement of		are miles on equity in the state of the stat	Managara and American Inches			
	Burner			Preis ab 1 VPE	Preis ab 3 VPE	VPE
				(5)		
1111	Bestellnr. Z196			1,30 €	0,99€	12
	Anzünder					-
						-
	and the second s					
	Aluminium F	olie		Preis ab 1 VPE	Preis ab 3 VPE	VPE
LULA WAR		-0	<del></del>			-
	Bestellnr. Z19	5		1,20 €	0,80 €	24
	rote Verpackun	g Ch			-	-
	Bestelinr. Z19			1,60 €	1,40 €	24
እርህር ኒჽርን	Vorgelochte Fuli					┼-
		and the same of th				
	Aluminiumfo	olien-Stanze	r	Preis ab 1 VPE	Preis ab 3 VPE	VPI
	Bestellnr. Z20				4.50	
	mit Edelstahl N	ladeln T		3,50	ξ 1,50 €	+
						1
						-

Preisliste Wasserpfeifen Seite 29 von 68

	Diffusor		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z150		A COLUMN TO THE PARTY OF THE PA		
			0,90 €	0,75 €	
	*				

and the second s	Glycerin	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z199	1,10 €	1,00 €	100
	100 ml	1,100		
				<del>                                     </del>

				· · · · · · · · · · · · · · · · · · ·	
	Molasse		Preis ab 1 VP	Preis ab 3 VPE	VPE
					<u> </u>
	Bestellnr. M001		1,15€	1,05€	100
LWGHIG plasses	110 ml		C		
THE STATE OF THE S	na utval				<u> </u>
	neutral				
		, y			and the same of the same

	Molasse	٨.		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			J'			<del>                                     </del>
	Bestellnr. M002			1,35 €	1,25€	100
	110 ml	Ch.				-
	Orange Cream					
	California Dreum Jk	(irsche, Red Dr	agon, Doppe	lapfel,		
	Mix Berry, Früchter	nix, Wasserme	lone, Blueber	ry,	and the state of t	······································

Zil Waha	Al Waha Molasse		Preis ab 1 VPE	Preis ab 3 VPE	VPE
103			3,50 €	3.00 €	48
7 Egg 10	Bestellnr. M004 250 g		3,50 €	3,00 €	70
Mosasse All	BITTE SIEHE BESTELLFORM	L ULAR			
رزن					

Preisliste Wasserpfeifen Seite 30 von 68

					000
	Al Waha Molasse		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Al Waha Melasse					
E lkg	Bestellnr. M005		8,10 €	7,20 €	12
pberry	1000 g			1	
	I BITTE SIEHE BESTELLFORM	<u>I</u> IULAR			
	Kühlstift klein		Preis ab 1 VPE	Preis ab 3 VPE	VPE
					200
2	Bestellnr. Z400-M2		1		200
	Besteim. 2400-M2		0,35€	0,20 €	
				<del>                                     </del>	
				1	
			Design of A VEN	Preis ab 3 VPE	VPE
	Kühlstift groß		Piels an i vru	) I Tele do o 1 - C	
			137		200
	Bestellnr. Z400-M3		0,45 €	0,30 €	-
<b>\</b> \\\\			1 2		
					╂—
Y		1	<del>}</del>		
<u></u>	Ice Pad		Preis ab 1 VPE	Preis ab 3 VPE	VPI
		$\overline{\mathbf{Y}}$			+-
	Bestellnr. Z401				
i.			0,70	€ 0,55€	-
					4-
The second secon		and the second s			<u> </u>
	AMY-Eiswürfel		Preis ab 1 VPE	Preis ab 3 VPE	VP
		NV v rozenogija. Pojeta nazanista vizi Seculla 1995 Alberto v vzganjelenia 1			_
Survey Chillette	D-4-llos 7400		5,50	€ 3,50 €	
am	Bestellnr. Z402		0,50		
					+
					+

Preisliste Wasserpfeifen Seite 31 von 68

						00
	Kohlebehälte	er silber, mitt	el I	Preis ab 1 VPE	Preis ab 3 VPE	VPE
A TE			Charles and the state of the st			
	Bestellnr. Z500	-MD018		6,30 €	4,90 €	12
				0,30 €	4,50 €	12
17, 37, 7						
	Voblobobölte	r silbor klai		lp : -L / Wor	la l'avar	l./se
	Kohlebehälte	er Silber, Klei		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Dantallar 7500	MDOOO				
	Bestelinr. Z500	-MD022		5,00 €	4,50 €	12
				0,00 €	4,50 €	12
					1	
		elitinolethiologistem og troch og sen og		MULTION ESTABLISTA ESTABLISTA DE LA CONTRACTOR DE LA CONT		
and the state of t	 	r ochwarz k	loin	Preis ab 1 VPS	No. in a Mar	lvo-
	Kohlebehälte	r Sunwarz, K	lem	Preis ab 1 VP	Preis ab 3 VPE	VPE
/\ III				75,		
	Bestellnr. Z500	-T-2		6,50 €	5,50 €	20
8			1	5,000	0,000	20
			4			
			Y			
	  Vahlahahälta	m 2om Cot		la de la designa	La company of the com	lype
	Kohlebehälte	er ser ser		Preis ab 1 VPE	Preis ab 3 VPE	VPE
A.			2.000			
	Bestellnr. Z501			17,40 €	16,50 €	3 sets
	C	)				
		uu galaya aanii lalla aliinke tiiri ka kaaska kala kaasa asaa kalailiink				
kolokil (Claure and a control of the	Windschutz	aroß silber		Preis ab 1 VPE	Preis ab 3 VPE	VPE
<b>≋</b> 29 <b>{</b>	VVIIIUSCIIUIZ	groß, ander		Fleis ab I VFE	FIEIS AD 3 VFE	VFE
4-14	Bestellnr. Z600	MD042				
	Destellint, 2000	-IVIDU IS		2,65€	2,50 €	79
		***************************************				

Preisliste Wasserpfeifen Seite 32 von 68

						000
egyptionneumennist of the second and the first process of the first configurations are second as a	Windschutz,	kupfer		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Land Company				(		
L	Bestellnr. Z600	)-MD023		4,60 €	4,30 €	60
1.00						
	·					
	Ascheteller	26 cm S1		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z70	U-S1		3,70 €	3,50 €	200
, 101, 101, 101, 101, 101, 101, 101, 10			<del>                                     </del>			
				,	1	-
	Ascheteller	30 cm S2		Preis ab 1 VPE	Prois ab 3 VPE	VPE
	Aschetener					
NOT VERY					1	<del>                                     </del>
	Bestellnr. Z70	0-S2		3,70 €	3,50 €	120
				3,70 €	3,30 €	1 2
NO MARKET				1 2		
ETHERA COURT DESIGNATION						
				A CONTRACTOR OF THE PROPERTY O	anny sy registronensensensensensensensensensensensensens	20 Marie 19
		00 02		Brois ab 1 VPE	Preis ab 3 VPE	VPE
	Ascheteller	30 cm 53		Fleis ab i vi L	1,0000000	
ELZERRO.			$\bigoplus_{\lambda}$			
	Bestellnr. Z7	00-S3				1.0
<b>圆</b> / /	,			3,70	3,50 €	12
S PRINT		100				+
1						
		<del>J'</del>			A STATE OF THE STA	
Control of the second of the s						1
	Aschetelle	r 30 cm S4		Preis ab 1 VPE	Preis ab 3 VPE	VP
						+-
	Bestelinr. Z7	00-54				$\perp$
1.4	Bestellill. 21	1		3,70	€ 3,50	12
., <b>*</b> : //;						-
7						+
1	1	1				_ _

Preisliste Wasserpfeifen Seite 33 von 68

	Ascheteller 30 cm S5		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z700	-S5			
			4,50 €	3,90 €	120

	Ascheteller S6		Preis ab 1 VPE	Preis ab 3 VPE	VPE
					-
	Bestellnr. Z700-S6_34cm	34 cm			200
	Bestellnr. Z700-S6_40cm	40 cm	2,70 €	2,50 €	200
					ļ
					┼

The state of the s				<u> </u>	
	Ascheteller S7		Preis ab 1 VP	Preis ab 3 VPE	VPE
			- (S)		
	Bestellnr. Z700-S7_34cm	34 cm			200
	Bestellnr. Z700-S7_40cm	40 cm	2,70 €	2,50 €	200
	·		<b>*</b>		
		1			
A Thomas in the Contract of th			Thinking the country of the country		
	COS				

#### Kohle

## Selbstzündende Kohle

	Three Kings	bis 48 Boxen	bis 49 Boxen	VPE
	Bestelinr. C102a	6,90 €	6,70 €	24
	Box á 100 Stück			
	Durchmesser: 40 mm			
	Datomitoccor. To thin			

AMV-Koble	110.11	lab 1 VPE	ab 3 VPE	ab Palette	VPE
AWII-ROITE		u		1 Pal. = 900 kg	
Restellar C109	40	4,00 €	3,50 €	3,00 €	18
		MOMENTAN	I AUSVERKAUFT		
Durchmesser: 40	mm			<b>y</b>	
	was a second of the second of		1		
		CALL	*		
	1 M M				
	Box á 100 Stück Durchmesser: 40	Bestellnr. C109_40 Box á 100 Stück  Durchmesser: 40 mm	Bestellnr. C109_40 4,00 €  Box á 100 Stück  MOMENTAN  Durchmesser: 40 mm	Bestellnr. C109_40	Bestellnr. C109_40

Preisliste Wasserpfeifen Seite 35 von 68

#### Naturkohle

	Al-Waha Kohle	ab 1 Palette	VPE
		1 Pal. = 900 KG	
المالية المالية المالية	Bestellnr. C112_1kg	1,80 €	900
	1 KG		
			· ************************************
			1

	Al-Waha Koh	le		(a) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	ab 1 Palette	VPE
-					1 Pal. = 900 KG	
	Bestellnr. C112	_3kg	MOMENTAN	AUSVERKAUFT	5,00 €	300
E A C	3 KG		144			
					Y	

AMY Gold Kohle			ab 1 Palette	VPE
			1 Pal. = 900 KG	
		CY		
Bestellnr. C115_0,5kg			1,20 €	1.800
1.800 Stück - Palette 900 KG				
0,5 KG				
	) y			

	AMY Gold Kohle	ab 1 Palette VPE
A 1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2		1 Pal. = 900 KG
(AMY GOLD)	Bestellnr. C115	<b>2,20 €</b> 900
	Bestellnr. C115 100 Y 900 KG	
	1 KG	

	AMY Gold Kohle	ab 1 Palette	VPE
a spira		1 Pal. = 900 K	3
AMYCOLD	Bestellnr. C115_3kg	6,50	€ 300
景意	3 KG		

Cocobrico 1	KG			ab 1 Palette	
- COCCONTION				1 Pal. = 900 KG	
and the second s				0.00.5	
Bestellnr. C116	_1KG			2,20 €	
900 Stück - Pal	ette 900 KG				<u> </u>
1 KG					1
	Bestellnr. C116	Bestellnr. C116_1KG 900 Stück - Palette 900 KG 1 KG	Bestellnr. C116_1KG 900 Stück - Palette 900 KG	Bestellnr. C116_1KG 900 Stück - Palette 900 KG	1 Pal. = 900 KG  Bestellnr. C116_1KG  900 Stück - Palette 900 KG

and the second s	Cocobrico 3 KG	ab 1 Palette VPE
	Secretary Control of the Control of	1 Pal. = 900 KG
അദ്വന്നുള്ള		
	Bestellnr. C116_1KG	6,50 €
Continues 	300 Stück - Palette 900 KG	
	3 KG	
one and the supplementary of t		

	Cocobrico 1 KG		$\wedge$	Yab 1 Palette	VPE
				1 Pal. = 900 KG	ļ
@@mig			(3)		
	D-4-llm 0446 4KC			19,00€	
<b>7</b> 7	Bestellnr. C116_1KG				<b>-</b>
A Comment	90 Stück - Palette 900 KG		<u> </u>		<del> </del>
	10 KG		<b>1</b>	<u> </u>	<del> </del>
					<u> </u>
		1			<u> </u>
		1			
	and the supplied of the suppli		and the second	<u> paga antino any nikamany taona ao mpina dia ao /u>	

Name: Anschrift: Telefon:	Dabes Egyptian Imports Neuburger Str. 109 86167 Augsburg Tel.: 0821/5439446	DABES Egyptian Imports
Datum:	Fax: 0821/5439663	Egyptian Imports

## Wasserpfeifen

**AMY Deluxe** 

Dragon



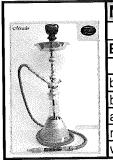
White + Black Dragon Preis ab 3 VPE VPE pro Farbe Farbe Bestellnr. Dragon-1/dragon-2 1-schläuchig 2-schläuchig 30,00 € 32,00 € 4 red black brown 34,00 € 32,00 € 4 purple white Größe: 73 cm green blue

	Arabien Gold	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Arabjen Gold		pro Farbe	pro Farbe	
	Bestellnr. AMY-004-1			
	gold	30,00€	28,00€	4
84MY003%				
			Größe: 70 cm	

Side Stream	Golden Dr	eam	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Trem Y			pro Farbe	pro Farbe	
	Bestellnr. A	MY-004			
	brown	amber	34,50 €	32,00 €	8
	blue	winered			
	red				
	darkbrown			Größe: 70 cm	
EAU.	green				



Heavy She	Preis ab 1 VPE Preis ab 3 VPE	VPE
	pro Farbe pro Farbe	
Bestelinr. AMY-005		
black	38,50 € 36,00 €	6
blue		
amber	70	
red	Größe: 70 cm	<del> </del>
white		



Miracles		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	<u> </u>
Bestellnr. AM	Y-006			
brown		32,50 €	29,00€	6
blue		No.	)	
amber		,		
red			Größe: 58 cm	
white		X Y	and the second s	

ll Å.	
Amyoo7 tr	

Round Orient		Ries ab 1 VPE	Preis ab 3 VPE	VPE	
		pro Farbe	pro Farbe		
Bestellnr. AMY-007	Ć			ļ	
brown	1	35,50 €	30,00€	6	
blue					
amber			Größe: 64 cm		
red white			Groide, 64 diri		



Hot Sahara		2.00	Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr. AM	-808				
brown		mit Koffer	53,00 €	49,00€	4
blue					
red				Größe: 70 cm	



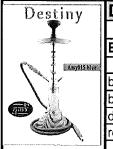
	Black Pearl		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Ì			pro Farbe	pro Farbe	
	Bestellnr. AMY-00	9			<u> </u>
	black		18,00 €	16,00€	8
	blue	mit Koffer	26,00€	23,00 €	6
	red			- 10	
	green			Größe: 42 cm	
					Account appropriate



Modern Dream	Tangan da sangan da s	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AMY-012				
light blue		44,00 €	39,00€	8
black red	mit Koffer	54,00 €	49,00€	4
black				
dark blue			Größe: 67 cm	
blue red				



Sweet Harmony	100 100 100 100 100 100 100 100 100 100	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AMY-014				
red line		25,00 €	19,00 €	6
light blue	mit Koffer	31,00€	25,00€	4
black red				
dark blue			Größe: 51 cm	



Destiny		Res ab 1 VPE	Preis ab 3 VPE	VPE			
		pro Farbe	pro Farbe				
Bestellnr. AMY-015							
	1	7					
black red white		25,00 €	18,00€	6			
blue red white			,				
dark blue							
red with line			Größe: 50 cm				



Crazy Shape	Preis ab 1 VPE   Preis ab 3 VPE	VPE
	pro Farbe pro Farbe	
Bestellnr. AM 016		
black white	25,00 € 18,00 €	6
red white		
green white		
	Größe: 65 cm	



Smoking	Deluxe	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr.	AMY-017			
yellow	black with white	18,00 €	16,00 €	8
green white	black			
dark blue red	d white			
black red wh	ite		Größe: 52 cm	
red with whit	e			



Candy		77 cm	Preis ab 1 VPE	Preis ab 3 VPE	VPE
<u> </u>			pro Farbe	pro Farbe	
Bestellnr. A	MY-018				
amber	blue 2	1-schläuchig	18,00 €	17,00€	6
amber 2	green	2-schläuchig	21,50 €	20,50€	6
purple black				Größe: 40 cm	
blue				and a second continuous assessment to the continuous and continuou	



Spirit			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr. A	MY-019				
amber	blue 2	1-schläuchig	34,00 €	33,00 €	6
amber 2	green	2-schläuchig	37,50€	36,50 €	6
purple	J	3-schläuchig	40,00€	39,00€	6
black		4-schläuchig	42,50€	41,50 €	6
blue				Größe: 60 cm	



				A	The second secon	
Spotlig	iht			Res ab 1 VPE	Preis ab 3 VPE	VPE
<u>landi perindineksidi.</u> 1				pro Farbe	pro Farbe	
Bestelln	r. AMY-020		C	7		ļ
black			1	13,00 €	10,50 €	12
red		^	V			
blue			<i>)</i>	<del> </del>	Größe: 32 cm	
amber					Grosse. 02 cm	



Princess	1239		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr. AV	021				
amber CO	clear	1-schläuchig	37,00 €	36,00€	4
amber 2	red	2-schläuchig	40,50 €	39,50 €	4
black		3-schläuchig	43,00 €	42,00 €	4
blue		4-schläuchig	45,50 €	44,50 €	4
blue 2				Größe: 70 cm	



Torpedo			Preis ab 1 VPE	Preis ab 3 VPE	VPE
. o. po		9311110 9332   \$2510 00 00 00 00 00 00 00 00 00 00 00 00 0	pro Farbe	pro Farbe	
Bestellnr. Al	VIY-022				
amber	purple	1-schläuchig	41,00 €	39,00€	4
amber 2		2-schläuchig	44,50 €	42,50 €	4
black		3-schläuchig	47,00 €	45,00 €	4
blue		4-schläuchig	49,50 €	47,50 €	4
red				Größe: 66 cm	

Preisliste Wasserpfeiefen Seite 41 von 68

	Smoky			Preis ab 1 VPE		VPE
	70			pro Farbe	pro Farbe	
Smoky	Bestellnr. A	MY-023				
	black	purple		14,00€	13,00 €	12
	green		mit Tasche	16,00€	15,00 €	8_
NEED)	red				Größe: 33 cm	
AMY 650 WALA	blue				Groise, 33 cm	<u> </u>
	pink		manife to account to the second secon		and the same of the same and the parameters of the same of the sam	

Sw	cet Bell	1	
1			20213
\	<b>M</b>	X	
			2.

Sweet Bell			Preis ab 1 VPE	Preis ab 3 VPE	VPE
<u> </u>			pro Farbe	pro Farbe	
Bestellnr. AM'	Y-024				
black	purple		15,00 €	14,00€	12
green	parpie	mit Tasche	18,000	17,00 €	8
red			,	Größe: 38 cm	
blue			<del></del>	Grose, 30 cm	
pink		page and the second and an analysis of the second and the second and the second and the second and the second		on province of secondary and a substitute of the secondary of the secondar	Talanunga-1880

			<u> </u>		M. BANKSON CONTROL OF
	Lady on fire		Pres ab 1 VPE	Preis ab 3 VPE	VPE
Lady on fire			pro Farbe	pro Farbe	
	Bestellnr. AMY-027	C)	7		
		1 1			<del> </del>
	black green	<b>&gt;</b>		<del>                                     </del>	<del>                                     </del>
H en treb	black blue				
	black red				
		A VI			
		<b>Y</b>			721100000000000000000000000000000000000
			alle transportation and the angular transportation and the same of		1911.000 provide 2002 Villago 1450

the same and the s		IS :- 1 AMPE	Brois sh 3 VDE	VPE
	Skull Hand	Preis ab 1 VPE		VI L
		pro Farbe	pro Farbe	
Ī	Bestellnr. AM \$451			
	silver	53,00 €	55,00€	4
\	red			
	beige		Größe: 61 cm	
			Groise, or citi	-
			garanteen see terrena para destant (de see militare en grant mense de see se s	and the second second second

Big Snake		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	7(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(0)(	pro Farbe	pro Farbe	
Bestellnr. AMY-156				
blue		63,00€	55,00 €	4
pink-kupfer				
black			Größe: 65 cm	
green			Gloise, 65 cm	<u> </u>
	blue pink-kupfer black	Bestellnr. AMY-156  blue pink-kupfer black	pro Farbe  Bestellnr. AMY-156  blue  pink-kupfer  black	blue black pro Farbe pro Farbe  63,00 € 55,00 €  Größe: 65 cm



Stillness	Preis ab 1 VPE Preis ab 3 VPE	VPE
<u> </u>	pro Farbe pro Farbe	
Bestellnr. AMY-440		
blue	25,00 € 17,00 €	12
black		
brown	0.110	
green	Größe: 48 cm	
red		



Glorious	1000		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		A SECURIOR CONTRACTOR OF THE C	pro Farbe	pro Farbe	
Bestellnr. AMY	-630-n-1				
blue red white	blue line	1-schläuchig	29,00 €	26,00€	6
red white	black with red	2-schläuchig	32,50€	29,50 €	6
black white	black with blue				
black milk	blue white		AUCH MITSCHV	VARZER	
black red white	yellow		RAUCHS ULE V	ERFÜGBAR	
black with green	dark blue		<b>Y</b>		-
red	light blue		15°		
black	green			Größe: 71 cm	
black blue Frost			<b>)</b> '	<u> </u>	
black red Frost		1 2			arkiya inganiya



Zuri		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AN	1Y-640-b-1			
schwarze Raud	chsäule ( )Y			<u> </u>
				+
red white	black with red			6
black white	black with blue			<u> </u>
black milk	blue white		Größe: 71 cm	
black red white	yellow			



Zuri C		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. AN	IY-640-s-1			
silberne Rauch	säule			
red white	black with red			6_
black white	black with blue			
black milk	blue white		Größe: 71 cm	
black red white	yellow			

Preisliste Wasserpfeiefen Seite 43 von 68

Amy NPC Modell 01	NPC, silbern	e Rauchsäule	)	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Größe: 71 cm			pro Farbe	pro Farbe	
Nic S Of and the	Bestellnr. NPC					6
	grün	mit silberner Rau	chsäule			
	Bestellnr. NPX	LS_AM_BL			A STATE OF THE STA	6
	blau	mit silberner Rau	chsäule			
	Bestellnr. NPX	S_AM_OR				6
	orange	mit silberner Rau	chsäule			
	Bestellnr. NPX	B AM RD				6
	rot	mit schwarzer Ra	nuchsäule			
	Destaller NDV	D ABA DI				
	Bestellnr. NPX blau	_B_AIVI_BL mit schwarzer Ra	urhsäule	XX	}	6
	Diau	THE SONWALZEL TO	Idonisadio			
	Bestellnr. NPX	B_AM_OR				6
	orange	mit schwarzer Ra	nuchsäule	7		

NPC, schwa	arzer Rauchsä	ule 🏡	Rreis ab 1 VPE	Preis ab 3 VPE	VPE	
Größe: 71 cm		(A)	pro Farbe	pro Farbe		
		17				
Bestellnr. NP	C_B_01_green	4			6	
grün	mit schwarzer Ra	auch aule				
	, D	<b>Y</b>				
Bestellnr. NP	X_S_AM_BL\	/			6	
blau	mit silberter Rau	ıchsäule				
be the first of the second sec						
Bestellnr. NP	X_S(AW)OR				6	
orange	silberner Rau	ıchsäule				
<u> </u>						
Bestellnr, N					6	
rot	mit schwarzer Ra	auchsäule				
	· ·					
Bestellnr. NP					6	
blau	mit schwarzer Ra	auchsäule	<b>M</b>			
Bestellnr. NP.	**** **** ****************************		L. L. P. POPUBASSE HAMASSANDO CONTRACTOR CONTRACTOR AND ANALYSIS	MITS AND THE STREET, THE STREE	6	
orange	mit schwarzer Ra	auchsäule				

	NPC. silbern	er Rauchsäule	}	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Green.	Größe: 71 cm	molificación de la companya de la co		pro Farbe	pro Farbe	
A7C. A-199. pro-	Bestellnr. NPC		443			6
	grün	mit silberner Rauc	hsäule			
	Bestellnr. NPX	S_AM_BL				6
	blau	mit silberner Raud	hsäule			
Personal	Bestellnr. NPX	S AM_OR				6
	orange	mit silberner Raud	chsäule			
	Bestellnr. NPX	B_AM_RD				6
	rot	mit schwarzer Ra	uchsäule			
	Bestellnr. NPX	B_AM_BL				6
	blau	mit schwarzer Ra	uchsäule		<b>y</b>	
	Bestellnr. NPX	B_AM_OR				6
	orange	mit schwarzer Ra	uchsäule			

black white	NPC, schwai	zer Rauchsät	ile 🗘	Rreis ab 1 VPE	Preis ab 3 VPE	VPE
<b>3</b>	Größe: 71 cm			pro Farbe	pro Farbe	<u> </u>
			1			
APC-D-002-Dia	Bestellnr. NPC	B_002_green	<b>* *</b>			6
	grün	mit schwarzer R	uch aule			
		, D	У			
	Bestellnr. NPX					6
	blau	mit silben er Rau	chsäule			
	_					
Consumer and the Constitution of the Constitut	Bestellnr. NPX	S AW OR				6
	orange 🕻	silberner Rau	chsäule			
		<i>Y</i>				+_
	Bestellnr NPX					6
	rot	mit schwarzer Ra	uchsäule			<b>-</b>
	Bestellnr. NPX					6
	blau	mit schwarzer Ra	uchsäule			
	Bestellnr. NPX					6
	orange	mit schwarzer Ra	uchsäule	and provided the state of the s	elitera e propografia de la Maria de La Caractera de Cara	

Amy Deluxe	NPX mit AMY	DELUXE		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Alliy Detake	Größe: 71 cm			pro Farbe	pro Farbe	
NPX:8:AAA:8L	Bestellnr. NPX	S_AM_RD		44,00 €	39,00€	6
	rot	mit silberner Rau	chsäule			
	Bestellnr. NPX	S AM BL		44,00 €	39,00€	6
		mit silberner Rau	chsäule			
	D 4-Um. NDV	S AM OR		44,00 €	39,00€	6
	Bestellnr. NPX		-1	77,000		
	orange	mit silberner Rau	icnsaule		,	
	Bestellnr. NPX	B AM_RD		44,00€	39,00€	6
	rot	mit schwarzer Ra	auchsäule			
	Bestellnr. NPX	R AM RI		44,08	39,00€	6
	blau	mit schwarzer R	L auchsäule			
	Diau	THIL SUIWAIZEI TO	1401104410			
	Bestelinr. NPX	B AM_OR		44,00€	39,00€	6
	orange	mit schwarzer R	auchsäule			

Butterfly

Rreis ab 1 VPE		Preis ab 3 VPE	VPE				
CY	pro Farbe	pro Farbe					
17							
4	44,00 €	39,00€	6				
chsadle							
<b>Y</b>	44.00 €	39.00 €	6				
sh săulo	44,00 €	00,00					
Crisaule							
	44,00 €	39,00€	6				
auchsäule			1				
		20.00.6	<del>  _</del>				
	44,00 €	39,00 €	6				
auchsäule		- Constitution of the Cons					
	chsaule chsäule	pro Farbe  44,00 €  chsäule  44,00 €  chsäule  44,00 €  44,00 €	pro Farbe pro Farbe  44,00 € 39,00 €  chsäule  44,00 € 39,00 €  chsäule  44,00 € 39,00 €				

Scorpion	

NPX mit Sco	rpion	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Größe: 71 cm		pro Farbe	pro Farbe	
Bestellnr. NPX	S_SC_RD	44,00 €	39,00 €	6
rot	mit silberner Rauchsäule			
Bestellnr. NPX	S_SC_OR	44,00 €	39,00€	6
orange	mit silberner Rauchsäule			<u> </u>
Bestellnr. NPX	S SC_RD	44,00 €	39,00€	6
rot	mit schwarzer Rauchsäule		<u> </u>	<del> </del>
Bestellnr. NP)	S_SC_OR	44,00 €	39,00 €	6
orange	mit schwarzer Rauchsäule			and the second second second



NPX mit Spic	ler		Preis ab 1 VPE		VPE
Größe: 71 cm			pro Farbe	pro Farbe	
Bestellnr. NPX			44,00 €	39,00€	6
rot	mit silberner Rau	ıchsäule			
	0.00.01		44,00 €	39,00 €	6
Bestellnr. NPX	_S_SP_BL mit silberner Rau	l obočulo	44,00€	39,00 €	- 0
blau	mit sliberner Rau	lonsaule			
Bestellnr. NPX	S SP OR		44,00 €	39,00€	6
orange	mit silberner Rau	L ichsäule	-1/1,00		
orange	THE SIBOTION TRAC	i i i i i i i i i i i i i i i i i i i		All Inc.	
Bestellnr. NPX	B SP_RD		44,00 €	39,00€	6
rot	mit schwarzer R	auchsäule			
Bestellnr. NPX			44,00€	39,00€	6
blau	mit schwarzer R	auchsäule			
			- CV-00-C	20.00.6	6
Bestellnr. NPX	_B_SP_OR	1 41-	44,00 €	39,00 €	0
orange	mit schwarzer R	aucnsaule			
		ALT SP			
con	mit schwarzer R				

Preisliste Wasserpfeiefen Seite 47 von 68



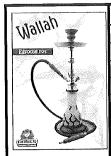
### **DABES Hookahs**

	Jinn		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
	Bestellnr.	QT-003			<u> </u>
	green	black	13,50 €	12,00 €	12
Brief.	purple				
	red			0.50 05	
	amber			Größe: 35 cm	<b>_</b>
	blue				

	Jolie			Preis a	WYPE	Preis ab 3 VPE	VPE
Gaste built wither red	000				Farbe	pro Farbe	
Jolie T	Bestellnr. QT-0	004		C	7		-
	dark blue	black			16,00 €	14,00 €	18
	blue line		C S	<u> </u>			
	black white		1 1 7			0-40 26 om	<u> </u>
	black red white			ļ		Größe: 36 cm	1
[ · · · · · · · · · · · · · · · · · · ·	bue red white				and the same of th		

	Chloe	A VY	Preis ab 1 VPE	Preis ab 3 VPE	VPE
1000(300-00)			pro Farbe	pro Farbe	
A Chloe	Bestellnr. QT-005	2			
	blue white	<b>X</b>	17,00 €	15,00 €	18
	blue line				<u> </u>
	black white			Größe: 31 cm	
	blue red white				

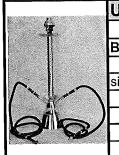
жүрт тики жалуу тике жапалуу танай биру се ке-	Crazy Dots	Special Art		Preis ab 1 VPE	Preis ab 3 VPE	VPE
				pro Farbe	pro Farbe	
	Bestellnr. ID	760a-1				<u> </u>
	brown white	red white		16,00€	14,00 €	12
	amber	green blue	mit Koffer	22,00 €	20,00 €	8
(E)	blue white	black red				
•	black line				Größe: 36 cm	—
	red blue					



Wallah	Preis ab 1 VPE Preis ab 3 VPE	VPE
	pro Farbe pro Farbe	
Bestellnr. EGS-0058_N		
blue	13,50 € 12,50 €	12
black		
red	0.10	
green	Größe: 53 cm	
amber		



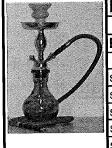
Baghira			Preis ab 1 VPE	Preis ab 3 VPE	VPE
Größe: 59 cm	(C)		pro Farbe	pro Farbe	
	P100-1 / WP100	0-2			
silber-blau	kupfer-rot	1 schläuchig	34,50 €	31,00€	6
silber-grün	black	mit Koffer	44,50	41,00€	4
	ent kupfer-transp	arent			
		2 schläuchig	57,50€	34,00 €	6
		mit Koffer	47,50 €	44,00 €	4



				الندي والمحاجب
Utopia groß		Ries ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. WP134-1 / W	P134-2	<i>Y</i>		
	17	11.00.0	00.00.6	-
silber transparent	1 șchia ychig	41,00 €	39,00€	6
	2 schläuchig	43,00 €	41,00 €	6
	A VY		Größe: 85 cm	



Utopia mittel		Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. WPV35-1 / WP135-2				
kupfer transparent	1 schläuchig	37,00 €	33,00 €	6
Rupror durispectorit	2 schläuchig	39,00€	35,00 €	6
	!		Größe: 70 cm	



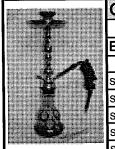
Danga		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	garan Marka da sa	pro Farbe	pro Farbe	
Bestellnr. WP1	53-1			
silber-schwarz		11,50 €	9,99€	12
silber-rot				
silber-grün				
silber-blau			Größe: 30 cm	
silber weiß				e de la companya de l



Pharao	Preis ab 1 VPE Preis ab 3 VPE	VPE
	pro Farbe pro Farbe	
Bestellnr. WP156-1		
silber-schwarz	18,00 € 12,50 €	12
silber-blau		
silber-violett		
silber-rot	Größe: 66 cm	
silber-grün		



Bambino		Preis ab 1 VPE Preis ab 3 VPE	VPE
Committee and Control of Control		pro Farbe pro Farbe	-0,00
Bestellnr. Wi	P157-1		
green	blue	6,50 € 4,50 €	20
purple			
white			
black		Größe: 26 cm	
orange			a manada managamal salami



				Tall 19 The Strate of the country of	
Goza Feuer			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr. HDN	/02-701	C)	Y		
silber-blau	silber-rot	11	14,00 €	12,00€	6
silber-schwarz					
silber-rosa					
silber-violett	3			Größe: 62 cm	
silber-grün		Y			



Goza Arabic Signs	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	pro Farbe	pro Farbe	
Bestellnr. HDW8-153			
schwarze Glasbowl mit schwarzer Rauchsäule	15,50 €	13,50 €	6
blaue Glasbowl mit blauer Rauchsäule			
violette Glasbowl mit violetter Rauchsäule			
rote Glasbowl mit roter Rauchsäule		Größe: 67 cm	
grüne Glasbowl mit grüner Rauchsäule			



Habibi Shisha	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	pro Farbe	pro Farbe	
Bestellnr. HABIBI			
silber-blau	14,00 €	12,00€	6
silber-schwarz			
silber-rot			
silber violett		Größe: 64 cm	
silber-grün			Account of the Control of the Contro

	⊲[Minil	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Name of the second		pro Farbe	pro Farbe	
	Bestellnr. MINIL			
$\mathbb{Z}^{N}$	blue	6,00€	5,00€	24
Mi.	purple			<u> </u>
(Carl)	orange			ļ
Virginia.	red		Größe: 25 cm	
	black			yes and the second second

COMMIRCANTAL SERVITATION OF THE COMMING TH

## Schläuche

	Kobraschla	auch	Preis ab 1 VPE	Preis ab 3 VPE	VPE
7			pro Farbe	pro Farbe	
	Bestellnr. S1	44 (groß 190 cm)	7,50 €	6,50 €	20
Particular Security		78 (klein 170 cm)	5,50 €	4,50 €	20
	braun	grün			
	weinrot	schwarz			
	leopard			ay af few the translet general consensus of this per people of the consensus delection described in the consensus of the cons	et engales and a training

Bestellnr. S162  Schwarz braun  pro Farbe  pro Farbe  pro Farbe  20  3,50 € 20		Mitsuba Luxus-Schlauch	Preis ab 1 VPE	Preis ab 3 VPE	VPE
schwarz			pro Farbe	pro Farbe	
	ta	Bestellnr. S162	1420€	3,50 €	20
		schwarz			

Mitsuba Standar	d-Schlauch	Preis ab 1 VPE		VPE
	<b>*</b>	pro Farbe	pro Farbe	
Bestellnr. S170		4,00 €	3,00€	20
braun				
schwarz				<u> </u>
blau	<del>y</del>			
	Bestellnr. S170 braun schwarz	braun schwarz blau	braun schwarz blau	pro Farbe pro Farbe  Bestelinr. S170  4,00 € 3,00 €  braun  schwarz blau

	Kunstlede	rschlauch		Preis ab 1 VPE		VPE
A				pro Farbe	pro Farbe	
	Bestellnr. S	 172		5,50 €	4,90 €	20
		Mundstück: 200	cm			
	blau	rot				
	braun	schwarz		VV.		
	grün					

	Ägyptischer Schlauch	Preis ab 1 VPE	Preis ab 3 VPE	VPE
0		pro Farbe	pro Farbe	
AA	Bestellnr. S179	7,30 €	6,50 €	20
M M	in Länder-Farben			
1 7 7				

*	AMY-Sch	lauch	ı la
1	Bestellnr. mit Aufdru		ng:
	rot	s	chw
	grün	b	chw rau
	blau		

AMY-Sc	hlauch lang	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr.	S192	6,90 €	6,00€	20
	uck, lang: 195 cm			<u> </u>
			<u> </u>	
rot	schwarz			<u> </u>
grün	braun			
blau		, X Y		None was a superior of the sup

r	Trapery mark that had	North Company of the	ong pagamana	
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۱			Mater	. [
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I	- 1		11 11 11 11 11 11 11 11 11 11 11 11 11	
1				

AMY-Schla	uch		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			> pro Farbe	pro Farbe	
		C			
Bestellnr. S1	93	1	2,20 €	1,60€	20
ohne Aufdru	ck am Griff: 170	cm			
		1 y			
rot	braun				
grün	schwarz	<u> </u>			
blau			on a margina di la come a margina margina margina margina a margina a margina a margina a margina a margina a m		

	<del>gamakida</del> metangan m	AMY Glasn	nundsrück		Preis ab 1 VPE		VPE
gesch	wungen				pro Farbe	pro Farbe	
		BestellpuS	95		4,50 €	4,00€	20
,		blau	transparent	neon-blau			
ger	rade	grün	silber	neon-pink			
		schwarz	rot	neon-grün			-
		gelb				and the second s	100 Harris

AMY Sch	lauch aus Silik	on	Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
Bestellnr. S	S197		4,50 €	4,00€	20
					ļ
blau	transparent	neon-blau		·	<u> </u>
grün	silber	neon-pink			
schwarz	rot	neon-grün			
gelb			nagana ka		Marikanya panasa parana

Schlauch mi	t langem Mundstück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
K		pro Farbe	pro Farbe	
Bestellnr. S199		5,00 €	4,70 €	20
aus Plexiglas				

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AMY Delu	ixe Schlauch	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
Bestellnr. S	5200	6,50 €	6,00€	36
schwarz	violett	$\sim$	ν	ļ
blau	weiß			
grün pink				
pink				



,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	AMY Schlauch 190 cm		Preis ab 1 VPE	Preis ab 3 VPE	VPE
			> pro Farbe	pro Farbe	
	·				
<b>A</b>	Bestellnr. S203	11	5,00 €	4,50 €	10
		1			
Thomas and	schwarz	Y			ļ
	blau	<b>Y</b>			ļ
7	pink	<i>y</i>			
	gelb				- Constitution of the Cons



AMY Schl	auch 194 cm	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
	MY.			
Bestellar S	204	6,00 €	5,50 €	10
schwarz	braun			
blau	·			<u> </u>
grün				
pink				ole management



AMY Sch	lauch 195 cm	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	pro Farbe	pro Farbe		
Bestellnr. S	5205	4,00 €	3,50 €	10
schwarz	braun			
blau	Diddii			
grün				
pink				

4	AMY Schlauch 200 cm	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		pro Farbe	pro Farbe	
	Bestellnr. S206	6,00 €	5,50 €	10
Amy-Schlauc 200cm lang	braun			
Stanch n. tang	grau			

	AMY Schl	auch 170 cm	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	35,000 p. 100 p.		pro Farbe	pro Farbe	
	Bestellnr. S	S207	2,00 €	1,80€	10
A CONTRACTOR OF THE PARTY OF TH			$\sim$	<u> </u>	
A STATE OF THE PARTY OF THE PAR	schwarz	rot			
	blau	gelb			
	orange				
	lila				

A	AMY Deluxe A	Muminiummu	ındstück 🏑	Breis ab 1 VPE		VPE
			<u> </u>	y pro Farbe	pro Farbe	
	Bestellnr. S208					20
	rot	blau	<b>Y</b>			
	pink silber	grün				

	AMY Delu	xe Anniniummundstück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	September 2 may contract to the contract of th		pro Farbe	pro Farbe	
	Bestel nr.)	3209			20
	TYP I	5200			
	rot	blau			
F. F.	pink	grün			
	silber	schwarz			

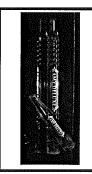
Preisliste Wasserpfeiefen Seite 55 von 68

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AMY Delux NPX Big Adapter	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Bestellnr. S211			
silber	_		
	1	)	
Bestellnr. S212			
schwarz			

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	<b>AMY Deluxe</b>	<b>Acryl Munds</b>	tück 🚗	Phets ab 1 VPE	Preis ab 3 VPE	VPE
				y pro Farbe	pro Farbe	
			(5)			
	Bestellnr. S21	3	4			50
	TYP I		inki Silikonschlauch			
	schwarz	orange				
	blau	transparent	<b>Y</b>			
	rot	silber				
	pink	grün				



AMY Delux	xe Ackyl Mund	Istück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
			pro Farbe	pro Farbe	
	2				
Bestellm S2	215				50
TYP II		inkl. Silikonschl	auch		
schwarz	orange				
blau	transparent				
rot	silber				
pink	grün				

				00012	/
A.	ICE Bazooka		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. S216				20
	AMY Delux Acryl Mu	ındstück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	ohne Logo		pro Farbe	pro Farbe	

	AMY Delux	Acryl Munds	tück	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	ohne Logo			pro Farbe	pro Farbe	
	Bestellnr. S2	 :17				50
	TYP III		inkl. Silikonschlauch	1		<u> </u>
	blau	rot		1	<b>)</b>	ļ
	grün	transparent				
	orange					<u> </u>
	pink					a december of the same

	_	CY	the state of the s	and the second second
	Endstück für Silikonschlauch	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		(5)		
	Bestellnr. S218			50
1 1 1	<b>\</b>	<b>Y</b>		
	1,7			<u> </u>
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Schlauchdichtung	Preis ab 1 VPE	Preis ab 3 VPE	VPE
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ene grand Commission Commission (Agreement Commission Commission Commission Commission Commission Commission Co	Tabaktopfdichtung	Preis ab 1 VPE	Preis ab 3 VPE	VPE

# Tabaktöpfe

	Luxus-Tab	aktopf	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Works				:
	Bestellnr. Z1	30	0,70 €	0,60€	100
	grün	rot			
	schwarz				
	braun				
	blau				personal de la proposició de la constante de la

king on menggang panggang ang menggang panggang panggang panggang panggang panggang panggang panggang panggang	Luxus-Tab	paktopf mit Windschutz	Preis ab 1 VPE	Preis ab 3 VPE	VPE
87. <b>Q</b> \$4.8	Bestellnr. Z	130a	205€	2,75€	100
	Dooton	1			
	schwarz	grün	<b>XY</b>		
	braun	weiß	7/7		<u> </u>
	blau		(5 [']		
	rot				
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	Doppelter '	Tabaktopf	17	Preis ab 1 VPE	Preis ab 3 VPE	VPE
M.						
	Bestellnr. Z1	32	Y	2,10 €	1,95€	100
57	braun	weiß				
	grün	rot				ļ
	schwarz blau					
manifestation and approximate the second	piau	<del>(C)</del>				

	AMY-Tak	Paktopf tief mit	AMY-Logo	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	$\Box$ C					
	Bestellnr.	Z140		1,30 €	0,90 €	100
	weiß	grün				
	rot	schwarz			Acres (Alleger	
	braun					
	blau				and the enterior in the money of the money of the providing to be provided in the contract of	

ologia garanta a social sementa garanta da anterior de la companya de la companya de la companya de la company	1-Loch-Tabaktopf	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z141	1,50 €	1,20 €	100
	schwarz			
	blau			
	rot			

	Tabaktop	f Jordan	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. 2	Z142	1,20 €	0,80 €	100
	rot	blau		<b>)</b>	
	rosa		N		
	schwarz				-
	grün		У		many water way a

	Tabaktop	f AMY-Delux	ce, 8 Löcher	Preis ab 1 VPE	Preis ab 3 VPE	VPE
			C	5 ^Y		
(, 185- <u>,</u> 11	Bestellnr. Z	145	1 1	1,80 €	1,50 €	100
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	schwarz	rot	, y			
	blau					
	grün					
	gelb					Statement of the statement of the

		$\wedge \mathbf{r}$			-
	Tabaktopf mit witigem Zylinder		Preis ab 1 VPE	Preis ab 3 VPE	VPE
- A CONTRACTOR CONTRAC					
	Bestellar Z	46	1,30 €	0,90€	100
	weiß	grün			<u> </u>
	rot	schwarz			
	braun				
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	Tontabaktopf	Preis ab 1 VPE	Preis ab 3 VPE	VPE
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	Bestellnr. Z200			100
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Head Pot		Preis ab 1 VPE	Preis ab 3 VPE	VPE
Bestellnr. Z203	3			100
	Administration			
				construction to the second second

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### Zubehör

	Kohlezange	Preis ab 1 VPE	Preis ab 3 VPE	VPE
1	Edelstahl Bestellnr. Z112	2,00 €	1,50 €	20
	Hammerzange	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z116	230€	1,80 €	20
pigates and the second	AMY-Kohlezange	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z117	1,50 €	1,20 €	20
	N. C.			
		L · L 4 WDE	Touris ob 2 VPE	VPE
	Hygiene-Mundstücke	Preis ab 1 VPE	Preis ab 3 VPE	Vri
A	Bestellnr. Z126a außen	0,03 €	0,02€	€ 100

4	Hygiene-Mundstücke	Preis ab 1 VPE	Preis ab 3 VPE	VPE
		A		
	Bestellnr. Z126i	0,03 €	0,02€	100
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Hygiene-Mundstücke, lang	Preis ab 1 VPE	Preis ab 3 VPE	VPE
Bestellnr. Z127			100
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	Kohlesieb	_	Pheis ab 1 VPE	Preis ab 3 VPE	VPE
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AFEN.		- 5 ^y		0.50.6	
	Bestellnr. Z129		0,70 €	0,50 €	50
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		<b>Y</b>			<b>_</b>

Kohlsieb		Preis ab 1 VPE	Preis ab 3 VPE	VPE
	2,			
Bestellar Z 29	) )a	0,50 €	0,40 €	50
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	Burner	1	Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. Z193		1,00 €	0,60 €	12
Alpen	Anzünder				

	Burner	Preis ab 1 VI	PE Preis ab 3 VPE	VPE
	Bestellnr. Z196 Anzünder	1,3	0,99€	12
	Aluminium Folie	Preis ab 1 V	PE Preis ab 3 VPE	VPE
Red Quality	Bestellnr. Z195 Al-Waha Folie	1,2	20 € 0,80 €	24
Property Comments of the Comme	Bestellnr. Z197 Vorgelochte Folie		1,40 €	24

Glycerin			Preis ab 1 VPE	Preis ab 3 VPE	VPE
			\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\		
	100	15	1406	1,00 €	100
Bestellnr. Z	199		1,10 €	1,00€	100
100 ml					
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	CY				<u> </u>
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	Molasse	Preis ab 1 VPE	Preis ab 3 VPE	VPE
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WAHA	Bestellitr M001	1,15 €	1,05€	100
Olosec ^s	110 ml			
TURAL				
1000	neutral			
				<u> </u>
				po de transportación de la company (se es

	Molasse			Preis ab 1 VPE	Preis ab 3 VPE	VPE
	Bestellnr. M002			1,35 €	1,25 €	100
لللللق	110 ml					
	Orange Cream, Tra California Dream, Kirs Mix Berry, Früchtemix	sche, Red Dr	agon, Doppela	pfel,		

COMMERCIALLY STRUCTURE

### Kohle

### Selbstzündende Kohle

Starbuzz Kohle		12 Boxen	bis 48 Boxen	bis 49 Boxen	VPE
Bestellnr. C101 4	0	6,40 €	6,20 €	6,00€	12
Durchmesser: 40 mr	m				
	Bestellnr. C101_4 Box á 100 Stück	Bestellnr. C101_40	Bestelinr. C101_40 6,40 €  Box á 100 Stück	Bestellnr. C101_40 6,40 € 6,20 €  Box á 100 Stück	Bestellnr. C101_40

Three Kings	bis 48 Boxen bis 49 Boxen	VPE
		_
Bestellnr. C102a		24
Box á 100 Stück	Ċ,	
Durchmesser: 40 mm		

energenesiste en grande programme et este del se tenne ment de part Principal de se describeratifolis	AMY-Kohle	4	ab Y VPE	ab 3 VPE	ab Palette	VPE
		, D	<i>y</i>		1 Pal. = 900 kg	
	Bestellnr. C109	40 -	4,00 €	3,50 €	3,00€	18
65	Box á 100 Stück		4,00 €	0,00	3,000	
100 B						<u> </u>
	Durchmesser.	mm				
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### Naturkohle

	Tom's Cococha 1 KG	ab 1	I VPE ab 2	VPE	VPE
	Bestellnr. C100a		3,50 €	3,00 €	20
TK:	1 KG MOMENTAN	AUSVERKAUFT			
	Tom's Cococha 3 KG	ab '	1 VPE ab 2	2 VPE	VPE
	Bestellnr. C100		9,00	8,00 €	5
	3 KG				
			2'		
	Kokoskol	ab 1 VPE ab 2		1 Pal. al. = 900 KG	VPE
10x02x011	Bestellnr. C108_1kg			1,70 €	10
	1 KG MOMENTAN	AUSVERKAUFT			
C 9 C 0 T 4 V 8	Cocojaya	ab 1 VPE ab	10 VPE ab	11 VPE	VPE
Grayonia aus Komunia aspal	Bestellnr. C110_3kg	6,50 €	6,00€	5,50 €	5
39 U	3 KG				

Preisliste Wasserpfeiefen Seite 66 von 68

	Al-Waha Kohle		ab 1 VPE	ab 2 VPE		VPE
					1 Pal. = 900 KG	***************************************
	Bestellnr. C112_1	1kg	1,95 €	1,80 €	1,80 €	15
āsigii nac AWaha toal	1 KG					
3,750						

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	Al-Waha	Kohle	ab 1 VPE	ab 2 VPE	ab 1 Pal,	VPE
:	- Mayorapara da		and an extension of the state o			
	Bestellnr.	C112_3kg				
	3 KG			olaskim direction of the state		i
		MOMENTAI	N AUSVERKAUF1			

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Coco-Fahi	n 3 KG	ab 1 VPE	ab 2 VPE	ab 1 Pal.	VPE
Bestellnr. C	 113_3kg		AMANA	;	
3 KG			, 4		
	MOMENTA	N AUSVERKAUFT		7	
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1	ab 1 VPE	

BANNER & WITCOFF, LTD.

INTELLECTUAL PROPERTY LAW

TEN SOUTH WACKER DRIVE 139 SUITE 3000 CHICAGO, ILLINOIS 60606-7407

TEL: 312.463.5000 FAX: 312.463.5001 www.bannerwitcoff.com

Shawn P. Gorman Direct: 312.463.5434

Email: sgorman@bannerwitcoff.com

September 11, 2013

#### Via Federal Express

MICIO INC. 720 Brooker Greek Blvd. Suite # 210 Oldsmar, FL 34677

Re: Infringement of Mya Saray's MYA Trademark, Registration Nos. 3,031,439 and

3,031,440

Dear Sir/Ma'am:

We represent Mya Saray, LLC ("Mya Saray") in trademark litigation against companies who have infringed Mya Saray's federally registered MYA trademarks, Registration Nos. 3,031,439 and 3,031,440 attached hereto as Exhibits 1 and 2.

We are writing to you because Mya Safay recently learned that your company is using the term "AMY" in connection with the sale and distribution of hookah products. Your company's use of the term "AMY" in connection with bookah products constitutes trademark infringement. Mya Saray therefore demands that your company immediately cease and desist all advertising, promotion, sales, offers for sale, and distribution of all hookah products under or in connection with the term "AMY," or any other term that is confusingly similar to Mya Saray's trademarks. *Please confirm, in writing, by September 20, 2013 That your company has ceased all such activity.* 

While Mya Saray is not inclined to take formal action at this time regarding your company's distribution of the products in question, Mya Saray will do so, if necessary, to enforce its intellectual property rights. If your company is willing to cooperate and promptly provide information regarding all hookah products that it has sold and/or distributed under or in connection with the term "AMY," then Mya Saray will be willing to negotiate a potential settlement of this matter on more economically-favorable terms and avoid you having to litigate this matter including having to pay increased damages and Mya Saray's attorneys' fees and costs. In particular, so that Mya Saray can propose terms of a more-favorable settlement offer to your company, please identify by September 20, 2013:

(2) All summary sales information (including the quantities sold and dates of sale) for the hookah products identified in (1) above.

If your company does not cooperate and produce all of the above-identified information, as well as confirm, in writing by September 13, 2013, that it has ceased all infringing activity, then Mya Saray will proceed with litigation to enforce its intellectual property rights. Please be aware that if you do not cooperate and Mya Saray is forced to proceed with litigation the damages amount that Mya Saray will seek at trial will far, far exceed any amount proposed by Mya Saray to settle this matter.

comminder of the state of the s We look forward to hearing from you.

Enclosures (Exhibits 1 and 2)

Int. Cl.: 34

Prior U.S. Cls.: 2, 8, 9 and 17

Reg. No. 3,031,440

United States Patent and Trademark Office

Registered Dec. 20, 2005

#### TRADEMARK PRINCIPAL REGISTER

MYA

MYA SARAY, LLC (VIRGINIA LIMITED LIABI-LITY CORPORATION) SUITE 1414 EAST 3709 SOUTH GEORGE MASON DRIVE FALLS CHURCH, VA 22041

For; water pipes for smoking, in class 34 (u.s. cls. 2, 8, 9 and 17).

FIRST USE 3-1-2002; IN COMMERCE 3-1-2002.

THE MARK CONSTYLIZED FORM

-349,903, FILED 1-9-2004.

N E. SAPPENFIELD, EXAMINING ATTORNEY

Int. Cl.: 34

Prior U.S. Cls.: 2, 8, 9 and 17

Reg. No. 3,031,439

United States Patent and Trademark Office

Registered Dec. 20, 2005

## TRADEMARK PRINCIPAL REGISTER

**MYA** 

MYA SARAY, LLC (VIRGINIA LIMITED LIABILITY CORPORATION)
SUITE 1414 EAST
3709 SOUTH GEORGE MASON DRIVE
FALLS CHURCH, VA 22041

FOR: WATER PIPES FOR SMOKING, IN CLASS 4 (U.S. CLS. 2, 8, 9 AND 17).

FIRST USE 3-1-2002; IN COMMERCE 3-1-2002.

THE MACK CONSISTS OF STANDARD CHARACTERS IN MOUT CLAIM TO ANY PARTICULAR FORT, STALE, SIZE, OR COLOR.

**ER.** NO. 78-349,755, FILED 1-9-2004.

ANN E. SAPPENFIELD, EXAMINING ATTORNEY

#### **Lourdes Perez**

From:

Lourdes Perez

Sent:

Monday, March 2, 2015 7:45 PM

To:

Lourdes Perez

Subject:

May Saray ./. Micio Inc: MYA ./. AMY: Your Ref.: 20486 opposition; Our Ref.: 7400-

T14-410Opp - Of the Mark: AMY GOLD TOBACCO MOLASSES (design)

From: Charrier Rapp & Liebau [mailto:charrier@charrier.de]

Sent: Friday, September 13, 2013 10:03 AM

To: 'sgorman@bannerwitcoff.com'

Subject: May Saray ./. Micio Inc: MYA ./. AMY

Dear Colleagues, Dear Mr Gorman,

we are the legal representatives in IP matters of Mr Ibrahim Dabes, Germany, delivering AMY products to clients in the US. We refer to a warning letter which you have sent to one of our client's customers, Micio Inc, dated September 11, 2013.

We do not share your opinion that the use of the mark AMY constitutes trade mark infringement of your client's trade marks MYA. The writing, pronunciation and meaning is completely different. The only common feature is that both words consist of the same letters, but this also holds for YAM or MAY. All these short words are clearly different and distinguishable by the customers.

The undersigned will be travelling next week. If you feel that the case is not yet terminated please feel free to direct further correpondence to our office keeping in mind that an answer will not be possible before the end of the month.

Yours Sincerely

Dr. Bertram Rapp Patentanwalt Patent Attorney

Unter den "Top-Kanzleien 2011" Se deutschen Markenanmeldungen "markenartikel" Ausgabe 10/12

CHARRIER RAPP & LIEBAU PATENTANWÄLTE PATENT ATTORNEYS

Fuggerstrasse 20 D-86150 Augsburg Germany

Tel: +49 (0)821 344991 0
Fax: +49 (0)821 344991 20
Email: <a href="mailto:charrier@charrier.de">charrier@charrier.de</a>
www.charrier.de

## EXHIBIT "D"

### **Lourdes Perez**

From: Sent:	P 掛hlwk拒odqnhqvkls#nhlwkC gqrwherrnffrp A P rqqd #Dsuld5:#5348#4号;#SP
To:	SdxdEldqfr
Cc:	Orxughv#Shuh}
Subject:	Uh#G lvfryhul #Uhvsrqvhv
	01.1% TTT 1.10d 1811.% T d 111.
Follow Up Flag:	Iroorz‡ks
Flag Status:	Frp solving
Paul,	
Unless otherwise directed, I wi	ll telephone you at 4:00pm EST on Tuesday.
,	
Agenda	
1. Reconsideration of marking	all discovery production and answers as a whole as commercially sensitive.
2. Reconsideration of disclosu	re and answers for discovery related to Dabes' specific hookahs
3. Arranging for inspection of	physical samples.
	• • •
4. Indicating which documents	s are responsive to which requests for production.
	and the state of the state of
5 Reconsideration of disclosu	re and answers for discovery related to design of specific hookahs.
o. Iteeonsideration of discreta	te and anowers for discovery related to design of specific morkans.
6 Reconsideration of disclosur	re and answer for discovery related to alternative brands of Dabes.
o. Reconsideration of disclosu	te and answer for discovery related to afternative orangs of Daoes.
Best Regards,	
Dest Regards,	
M Voith Plankonshin	
M. Keith Blankenship	
Da Vinci's Notebook, LLC	
10302 Bristow Center Dr.	
No. 52	

Confidentiality: The information contained in this e-mail and any attachments is confidential and privileged information and intended only for the use of the individual or entity to whom it is addressed. This e-mail and any attachments are or may constitute information which is confidential and privileged as an attorney-client communication and/or as attorney work product. If the reader of this e-mail is not the intended recipient, or the employee or agent responsible to deliver this communication to the intended recipient, you are hereby notified that any distribution, copying, or use of this communication, electronic or otherwise, is strictly prohibited. Furthermore, we expressly reserve and do not waive any privilege. If you have received this communication in error, please notify us immediately by telephone, by reply to the sender via e-mail, or by e-mail to "keith@dnotebook.com", and please delete this e-mail and any accompanying attachments from your in box, recycle bin, and any other directory, file, or electronic storage. Thank you for your cooperation.

On Apr 25, 2015, at 10:04 PM, Paul Bianco < pbianco@fggbb.com > wrote:

Keith-

Tuesday at 4PM works. I look forward to receiving the issues you wish to discuss beforehand.

Kind Regards Paul

Paul Bianco Ph.D.

<image002.png>

Registered Patent Attorney, U.S. Patent & Trademark Office FLEIT GIBBONS GUTMAN BONGINI & BIANCO P.L.

21355 E. Dixie Highway, Suite 115, Miami, FL 33180, USA

305-830-2600, fax 305-830-2605, www.fggbb.com, pbianco@fggbb.com

CONFIDENTIALITY NOTICE: This communication is intended only for the addressee(s) and may contain confidential and/or privileged information. Any use, disclosure, dissemination, retransmission, distribution, or copying, of the information in this communication by other than the intended recipient(s) is strictly prohibited. If you received this email in error, please contact the sender, delete the email from all computers, and destroy all copies.

From: M. Keith Blankenship [mailto:keith@dnotebook.com]

Sent: Thursday, April 23, 2015 3:49 PM

To: Paul Bianco Cc: Lourdes Perez

Subject: Re: Discovery Responses

Paul,

Thank you. I have wide availability Monday and Tuesday. You can have your choice of times.

I will also work on a brief list of topics.

- Keith

Sent from my Verizon Wireless 4G LTE DROID

Paul Bianco < pbian	co@fggbb.com> wrote:
Keith-	
know what days early	mail. I am out of the office on business travel, leaving today and do not return until Monday. Let us y next week work for you and we will confirm our availability. I would also appreciate if you could lining in some detail the issues with the discovery you wishes to discuss, so we can be prepared to
Thanks and regards	
Paul	
<image003.png></image003.png>	Paul Bianco Ph.D.  Registered Patent Attorney, U.S. Patent & Trademark Office FLEIT GIBBONS GUTMAN BONGINI & BIANCO P.L.  21355 E. Dixie Highway, Suite 115, Miami, FL 33180, USA 305-830-2600, fax 305-830-2605, <a href="https://www.fggbb.com">www.fggbb.com</a> , <a href="mailto:pbianco@fggbb.com">pbianco@fggbb.com</a>
disclosure, dissemination, re	This communication is intended only for the addressee(s) and may contain confidential and/or privileged information. Any use, transmission, distribution, or copying, of the information in this communication by other than the intended recipient(s) is strictly is email in error, please contact the sender, delete the email from all computers, and destroy all copies.
Lourdes,	
Do you have availa	bility this Friday to discuss Dabes' discovery responses and objections?
Best Regards,	

M. Keith Blankenship Da Vinci's Notebook, LLC

10302 Bristow Center Dr.

No. 52

Bristow, VA 20136

703-581-9562 keith@dnotebook.com

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## EXHIBIT "E"

#### **Lourdes Perez**

From: SdxdEldqfr

Sent: Iugd # d # 8 # 348 # 3; # ₽

To: P #\hlwk#@dqnhqvkls

Cc: Orxughv#Shuh}

Subject: UH#G lvfryhu | #Jhvsrqvhv

Follow Up Flag: Ironz #ks
Flag Status: Frp schwhg

#### Keith-

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#### Kind Regards Paul



Paul Bianco Ph.D.

Registered Patent Attorney, U.S. Patent & Trademark Office FLEIT GIBBONS GUTMAN BONGINI & BIANCO P.L. 21355 E. Dixie Highway, Suite 115, Miami, FL 33180, USA

305-830-2600, fax 305-830-2605, <u>www.fggbb.com</u>, <u>pbianco@fggbb.com</u>

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From: Paul Bianco

Sent: Tuesday, April 28, 2015 2:49 PM

To: 'M. Keith Blankenship'

Cc: Lourdes Perez

Subject: RE: Discovery Responses

#### Thanks.



Paul Bianco Ph.D.

Registered Patent Attorney, U.S. Patent & Trademark Office FLEIT GIBBONS GUTMAN BONGINI & BIANCO P.L.

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From: M. Keith Blankenship [mailto:keith@dnotebook.com]

Sent: Tuesday, April 28, 2015 2:19 PM

To: Paul Bianco Cc: Lourdes Perez

Subject: Re: Discovery Responses

Sure.

Best Regards,

M. Keith Blankenship
Da Vinci's Notebook, LLC
10302 Bristow Center Dr.
No. 52
Bristow, VA 20136
703-581-9562
keith@dnotebook.com

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I am at a meeting out of the office that is running late. Can we move our call to 430pm?

Please let me know. Thanks Paul

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----- Original message ------From: "M. Keith Blankenship"

Date:04/27/2015 11:07 PM (GMT-05:00)

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Unless otherwise directed, I will telephone you at 4:00pm EST on Tuesday.
Agenda
1. Reconsideration of marking all discovery production and answers as a whole as commercially sensitive.
2. Reconsideration of disclosure and answers for discovery related to Dabes' specific hookahs
3. Arranging for inspection of physical samples.
4. Indicating which documents are responsive to which requests for production.
5. Reconsideration of disclosure and answers for discovery related to design of specific hookahs.
6. Reconsideration of disclosure and answer for discovery related to alternative brands of Dabes.
Best Regards,
M. Keith Blankenship Da Vinci's Notebook, LLC 10302 Bristow Center Dr. No. 52

Bristow, VA 20136 703-581-9562 keith@dnotebook.com

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On Apr 25, 2015, at 10:04 PM, Paul Bianco < pbianco@fggbb.com > wrote:

Keith-

Tuesday at 4PM works. I look forward to receiving the issues you wish to discuss beforehand.

Kind Regards Paul

Paul Bianco Ph.D.

Registered Patent Attorney, U.S. Patent & Trademark Office

<image002.png>

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To: Paul Bianco Cc: Lourdes Perez

Subject: Re: Discovery Responses

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I will also work on a brief list of topics.

- Keith

Sent from my Verizon Wireless 4G LTE DROID

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Keith-

Thank you for your email. I am out of the office on business travel, leaving today and do not return until Monday. Let us know what days early next week work for you and we will confirm our availability. I would also appreciate if you could send us an email outlining in some detail the issues with the discovery you wishes to discuss, so we can be prepared to talk.

#### Thanks and regards

Paul

Paul Bianco Ph.D.

Registered Patent Attorney, U.S. Patent & Trademark Office <image003.png>

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From: M. Keith Blankenship [mailto:keith@dnotebook.com]

Sent: Wednesday, April 22, 2015 1:33 PM

To: Lourdes Perez; Paul Bianco Subject: Discovery Responses

Lourdes,

Do you have availability this Friday to discuss Dabes' discovery responses and objections?

Best Regards,

M. Keith Blankenship Da Vinci's Notebook, LLC

10302 Bristow Center Dr.

No. 52

Bristow, VA 20136

703-581-9562 keith@dnotebook.com Confidentiality: The information contained in this e-mail and any attachments is confidential and privileged information and intended only for the use of the individual or entity to whom it is addressed. This e-mail and any attachments are or may constitute information which is confidential and privileged as an attorney-client communication and/or as attorney work product. If the reader of this e-mail is not the intended recipient, or the employee or agent responsible to deliver this communication to the intended recipient, you are hereby notified that any distribution, copying, or use of this communication, electronic or otherwise, is strictly prohibited. Furthermore, we expressly reserve and do not waive any privilege. If you have received this communication in error, please notify us immediately by telephone, by reply to the sender via e-mail, or by e-mail to "keith@dnotebook.com", and please delete this e-mail and any accompanying attachments from your in box, recycle bin, and any other directory, file, or electronic storage. Thank you for your cooperation.

# EXHIBIT "F"

#### **Lourdes Perez**

Sent: Iulgd # d # 8 # 348 # 53 # P

To: SdxdEllqfr
Cc: Orxughv#Shih}

Subject: Uh#G lvfryhu #Jhvsrqvhv

Follow Up Flag: Ironz #ks
Flag Status: Frp solwhg

Hi Paul,

I don't recall being tasked with sending over any description of deficiencies. Other than our meeting agenda, and our telephonic discussion, I'm not sure that there is more to add. I did indicate that I would consider sending over support for some of my discovery requests. I don't believe that we indicated that this was a contingency. Incidentally, I don't think that there is anything special to provide in the way of caselaw supporting discovery into the relevance of products associated with a trademark and the ability of a party to physically examine a product.

Although we set no fixed dates whereby you would make a decision on whether you would provide updated disclosure to me, I had expected something by this point. It has been 2.5 weeks. I can appreciate that your client is in Germany, but most of the concerns that I had for you related to legal positions. Do you have any updates, documents, answers to provide at this time?

Best Regards,

M. Keith Blankenship Da Vinci's Notebook, LLC 10302 Bristow Center Dr. No. 52 Bristow, VA 20136 703-581-9562 keith@dnotebook.com

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Kind Regards Paul

Paul Bianco Ph.D.

<image002.png>

Registered Patent Attorney, U.S. Patent & Trademark Office

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From: Paul Bianco

**Sent:** Tuesday, April 28, 2015 2:49 PM

To: 'M. Keith Blankenship'

Cc: Lourdes Perez

Subject: RE: Discovery Responses

Thanks.

Paul Bianco Ph.D.

<image002.png>

Registered Patent Attorney, U.S. Patent & Trademark Office FLEIT GIBBONS GUTMAN BONGINI & BIANCO P.L.

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Sent: Tuesday, April 28, 2015 2:19 PM

To: Paul Bianco Cc: Lourdes Perez

Subject: Re: Discovery Responses

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Best Regards,

M. Keith Blankenship Da Vinci's Notebook, LLC 10302 Bristow Center Dr. No. 52 Bristow, VA 20136 703-581-9562 keith@dnotebook.com

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3. Arranging for inspection of physical samples.
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2. Reconsideration of disclosure and answers for discovery related to Dabes' specific hookahs

Paul

Paul Bianco Ph.D.

<image002.png>

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Paul Bianco Ph.D.

<image003.png>

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From: M. Keith Blankenship [mailto:keith@dnotebook.com]

Sent: Wednesday, April 22, 2015 1:33 PM

**To:** Lourdes Perez; Paul Bianco **Subject:** Discovery Responses

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Best Regards,

M. Keith Blankenship Da Vinci's Notebook, LLC

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# EXHIBIT "G"

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

For the Mark: AMY DELUXE (design)	
Registration Date: May 27, 2014	
Mya Saray, LLC,	)
Petitioner,	) Proceeding No.: 92060249
v.	)
Dabes, Ibrahim DBA Dabes Egyptian Imports,	) )
Registrant.	)

## SUPPLEMENTAL ANSWERS AND OBJECTIONS TO PETITIONER'S FIRST SET OF INTERROGATORIES TO REGISTRANT IBRAHIM DABES

Registrant incorporates by reference the preliminary statement and General Objections made to the original set of Response and Objections to Petitioner's First Set of Interrogatories to Registrant Ibrahim Dabes.

#### SUPPLEMENTAL ANSWERS TO SPECIFIC INTERROGATORIES

**INTERROGATORY NO. 1**. Explain why (including the inspiration, significance, and meaning) Defendant selected the designation "AMY" as a brand for Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY DELUXE (design), because AMY is the name of Registrant's daughter. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 2.** Explain the rationale for adopting the designation "AMY" in connection with Defendant's Products and why "AMY" was selected over alternative designations, with specific reference to those designations.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY DELUXE (design), because AMY is the name of Registrant's daughter. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 3**. If Defendant utilizes alternative brand designations in connection with Defendant Products, identify such alternative brand designations by its literal elements (e.g. words) and design elements (e.g., illustrated components).

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: See documents produced in response to Petitioner's First Set of Requests for Production. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 4.** Explain other inspiration and meaning of the alternative brand designations responsive to INTERROGATORY NO. 3 how the Products for such other alternative brand designations relate to Defendant Products sold under the AMY Brand with specific reference to Defendant Product quality, Defendant Product quantity (generally at this time), Defendant Product manufacturing source, the characteristics of prospective purchasers of the Defendant Products, and other significant criteria.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: See documents produced in response to Petitioner's First Set of Requests for Production. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 8.** Identify each hookah sold under the AMY Brand (including all internal names, code names, marketing names, and any other unique designations) and each hookah's date of first sale anywhere in the world, and its date of first sale under the AMY Brand, if different.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Registrant objects to the portions of this interrogatory that relate to goods sold outside the US. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: All hookahs sold in the US were labeled with the AMY DELUXE (design) mark.

**INTERROGATORY NO. 9.** Identify the average distribution price and manufacturer's suggested retail price, if any, of each hookah of INTERROGATORY NO. 8.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. In addition, Registrant objects to the portions of this interrogatory that relate to goods sold outside the US. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: See documents produced in response to Petitioner's First Set of Requests for Production. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY** NO. 11. Did you consider the affects of using the name AMY on Defendant Products notwithstanding Plaintiff's use of MYA with Plaintiff Products, and if so, what factors did you consider to be related to dispelling confusion?

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY DELUXE (design), because AMY is the name of Registrant's daughter. Never gave any consideration to MYA as it is completely different and not confusing with regards to Registrant's use of the mark AMY DELUXE (design). This supplemental answer contains CONFIDENTIAL information.

#### INTERROGATORY NO. 12. Describe the extent to which Defendant searched

for marks that might impede the use or registration of any AMY Brand for Defendant Products.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds that it seeks information that is irrelevant, privileged and/or attorney work product. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The application is based on German Registration No. 302012000347 under Section 44(e) of the Trademark Act. It is Registrant's understanding that a search was conducted by the German Patent and Trade Mark Office before the foreign mark was registered. Additionally, the USPTO conducted a search which revealed that there were no registered or pending marks, including those allegedly owned by Petitioner, that would bar registration of Registrant's mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 13**. Identify the individuals most knowledgeable about the advertising, marketing, and/or promotion of each hookah of INTERROGATORY NO. 8.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The persons most knowledgeable are Registrant and Mrs. Larissa Stempfle. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 14.** Identify the individual most knowledgeable about the appearance and aesthetic properties of each hookah of INTERROGATORY NO. 8.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: Registrant and Mrs. Larissa Stempfle. This supplemental answer contains HIGHLY CONFIDENTIAL information.

INTERROGATORY NO. 15. Describe in detail the date and circumstances under which Defendant first learned of each of the MYA Trademarks, including but not limited to, the persons that became aware of each of the MYA Trademarks, and all steps and actions taken, with respect to the design, development, offer for sale, and sales of Defendant Products identified in response to INTERROGATORY NO. 8, including any efforts by Defendant to avoid confusion between MYA Trademarks and the AMY Brand.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: Registrant cannot recall an exact date; however, on or

about September 13, 2013 Registrant's attorney responded to a cease and desist letter from Petitioner asserting there was no likelihood of confusion. See documents produced in response to Petitioner's First Set of Requests for Production. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 16.** Identify each and every person with knowledge of any and all instances where Defendant received mail, orders, deliveries, telephone calls, bill, payments, invoices, or any other communications referring to or inquiring about either Plaintiff or the MYA Trademarks.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: On or about September 13, 2013 Registrant's attorney responded to a cease and desist letter from Petitioner asserting there was no likelihood of confusion. The undersigned received a courtesy copy of the Petition to Cancel the subject registration via email on October 24, 2014. This supplemental answer contains HIGHLY CONFIDENTIAL information.

INTERROGATORY NO. 17. Identify all trade shows attended by Defendant,

including name of trade show, date, and location, within the past four (4) years in which Defendant marketed Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: Registrant attended the TPC 2014 trade show in Las Vegas, Nevada 29.01-30.01.2014.

INTERROGATORY NO. 18. Identify each and every person with knowledge of any and all instances where Defendant obtained any knowledge or information regarding any confusion whatsoever on the part of any person about the source, affiliation, or sponsoring of any of Plaintiff Product and the source, affiliation, or sponsoring of Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: None.

INTERROGATORY NO. 19. State in detail all facts upon which Defendant bases its denial of likelihood of confusion of any of the MYA Trademarks and provide the

identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and thins relating to any such facts, including information that refutes Defendant's denial.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The marks are dissimilar in appearance, sound, connotation, commercial impression and any other factors which could have a bearing on the fact of no likelihood confusion in the marketplace. Trademark Examining Attorney assigned to the subject registration concluded on November 21, 2013 that there were no registered or pending marks, including those allegedly owned by Petitioner, that would bar registration of Registrant's mark. Simply because the respective marks have three letters in common does not mean that confusion, mistake or deception as to the source of the products is likely. Additionally, Registrant's mark includes the additional terms "DELUXE" and the respective design elements that further preclude any likelihood of confusion.

**INTERROGATORY NO. 20**. State in detail all facts upon which Defendant bases any defense raised by Defendant in this action and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and things relating to any such facts, including information that refutes Defendant's denial.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The marks are dissimilar in appearance, sound, connotation, commercial impression and any other factors which could have a bearing on the fact of no likelihood confusion in the marketplace. Trademark Examining Attorney assigned to the subject registration concluded on November 21, 2013 that there were no registered or pending marks, including those allegedly owned by Petitioner, that would bar registration of Registrant's mark. Simply because the respective marks have three letters in common does not mean that confusion, mistake or deception as to the source of the products is likely. Additionally, Registrant's mark includes the additional terms "DELUXE" and the respective design elements that further preclude any likelihood of confusion.

INTERROGATORY NO. 21. State the exact date(s) on which Defendant will rely as to when its use of the AMY Logo commenced in connection with the sale or

distribution of each constituent (e.g., cigarettes) of the Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: Registrant's US trademark registration was obtained under Section 44(e) of the Trademark Act. This supplemental answer contains CONFIDENTIAL information.

Identify all documents, purchase orders, invoices, labels, INTERROGATORY NO. 22. advertising flyers, brochures, other writing whatsoever that or any Defendant will rely establish date(s) specified ANSWER to upon to the in INTERROGATORY NO. 21.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 23**. With respect to the first use(s) of the marks of the AMY Logo in connection with the sale of each product and/or service identified in above INTERROGATORY NO. 21, state:

- a) Each manner in which the applied---for designation was used, e.g. by affixing to containers, labels, or in newspaper advertising or fliers;
- b) If the applied---for designation was printed on containers for the product or on labels, the name and address of the person(s) or organization(s) which printed them;
- c) If the applied---for designation was used in brochures or fliers, the name and address of the person(s) or organization(s) which printed them;
- d) If the applied---for designation was used in media advertising, the name and address of the person(s) or organization(s) which advertised them;
- e) Whether the product and/or service was sold;
- f) Whether the product and/or service was offered free of charge;
- g) The name and address of the person(s) or organization(s) to whom the product and/or service was sold; and
- h) Whether the sale of each product under the applied---for designation has been continuous from each date specified in above INTERROGATORY NO. 21 to the present.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Registrant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: No answer required. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 25.** Identify each item of sales literature, including brochures and fliers produced by or for Registrant for distribution in the United States to advertise each of the Products.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Registrant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: A brochure.

**INTERROGATORY NO. 27**. List all other media, not already identified, where Registrant has advertised each of the Products, state the amount expended by Defendant in the United States in the advertisement of each Product.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Registrant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: No advertising in other media and no expenditures. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 29**. Identify the Defendant's predecessors-in-interest, and all of its subsidiaries and affiliated companies, and the officers, directors, employees, agents and representatives thereof.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 33.** Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as AMY---018 and the Econo---MYA QT depicted in Exhibit 4.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding, particularly as it seeks the comparison of disparate objects for no purpose. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The product "AMY-018" is no longer sold in the US. There are many differences between the two products including the bowls have a completely different shapes, the adapter is completely different, the tobacco had is different, the plate has a different form and the suction tube has a different form and styling.

**INTERROGATORY NO. 34.** Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as Jinn and the MYA QT depicted in Exhibit 5.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding, particularly as it seeks the comparison of disparate objects for no purpose. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The JINN product is no longer on sale in the US; nevertheless, there are still many differences in detail regarding the parts.

**INTERROGATORY NO. 35.** Identify any and all documents responsive to the foregoing interrogatories or other Document Request issued by Plaintiff in this action which are lost or unavailable and identify the date(s) the loss or unavailability was first discovered, the person(s) who first discovered the loss or unavailability and the person(s) most knowledgeable about the contents of such lost or unavailable documents.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Registrant objects to this Interrogatory on the ground that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

INTERROGATORY NO. 36. Identify all persons who participated in any way in the preparation of the ANSWERs or responses to these interrogatories and state

specifically, with reference to interrogatory numbers, the area of participation of each such person (excluding only Registrant's lawyers or their representatives).

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Registrant objects to this Interrogatory on the ground that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: The persons who provided information are Mr. Ibrahim Dabes and Mrs. Larissa Stempfle. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 37.** Identify any study, research, focus group, testing or similar validation procedure employed by Defendant or any person or entity at Defendant's request or on behalf of Defendant to determine the presence and/or absence of any confusion between Plaintiff's Products and the Defendant's Products when offered under the applied---for designations or AMY Brand generally.

SUPPLEMENTAL ANSWER: In addition to the general objections above, Registrant objects to this Interrogatory on the grounds that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Additionally, Registrant objects to this Interrogatory on the grounds that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Registrant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

Date: May 22, 2015

Respectfully submitted,

/Paul D. Bianco/ Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 East Dixie Highway, Suite 115 Miami, Florida 33180

Ph: 305 830-2600 Fax: 305 830-2605

Email: tmmiami@fggbb.com

Attorneys for Registrant Dabes, Ibrahim

### **CERTIFICATE OF SERVICE**

It is hereby certified that a copy of this SUPPLEMENTAL ANSWERS AND OBJECTIONS TO PETITIONER'S FIRST SET OF INTERROGATORIES TO REGISTRANT IBRAHIM DABES was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Petitioner, on this 22nd day of May 2015.

/Paul D. Bianco/ Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL

# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Registration No			
For the Mark: AMY	` ,		
Registration Date: Ma	ay 27, 2014		
Mya Saray, LLC,		)	
		)	
	Petitioner,	)	Proceeding No.: 92060249
		)	C
v.		)	
		)	
Dabes, Ibrahim DBA		)	
Dabes Egyptian Impo	orts,	)	
	•	)	
	Registrant.	ó)	
		-	

# SUPPLEMENTAL ANSWERS AND OBJECTIONS TO PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION TO REGISTRANT IBRAHIM DABES

Registrant incorporates by reference the preliminary statement and General Objections made to the original set of Response and Objections to Petitioner's First Set of Requests for Production to Registrant Ibrahim Dabes.

#### SUPPLEMENTAL ANSWERS TO REQUESTS

**REQUEST NO. 1:** All documents that are identified in, or should have been identified in, or concern or relate to your answer's to Plaintiff's First Set of Interrogatories to Defendant Dabes, including but not limited to, any documents you used or referred to in answering the Interrogatories.

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents produced herewith, Bates numbered 00001-00143.

**REQUEST NO. 2:** All licenses or other documents provided to you constituting permission from a government entity or subdivision – federal, state or local – to perform acts in commerce, including those related to buying/selling of tobacco and related products, permissions for importation of goods, zoning variances, etc.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 3:** All documents that reflect or reference a sale of any Subject Hookah to any Distributor in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00054-00070.

**REQUEST NO. 4:** All documents that reflect or reference a sale of any Subject Hookah to any Retailer in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 5:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Distributor in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: For documents that show sales to distributors for goods marked with the AMY DELUXE (DESIGN) mark, see documents attached to Request No. 1, Bates numbered 00054-00070.

**REQUEST NO. 6:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Retailer in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 7:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Distributor in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See answer to Request No 5, Bates numbered 00054-00070.

REQUEST NO. 8: All documents that reflect or reference a sale of any of Defendants

Products with the AMY Logo to any Retailer in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 9:** A physical specimen of each Subject Hookah.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: No document requested. For photographs that show goods marked with the AMY DELUXE (DESIGN) mark, see documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 10:** All documents and things that relate or refer to, or describe Defendant's inventory of hookah products physically located in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 11:** All documents that relate or refer to, or describe, the locations for physical storage or warehousing of Defendant Products or packaging for Defendant Products in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 12:** All documents that relate or refer to, or result from, the Defendant's importation of Defendant Products into the United States since the adoption of the AMY Brand or commercialization of the Subject Hookahs (whichever is earlier). This will include correspondence, invoices, and any other documents from manufacturers, importers, freight forwarders, customs agents, and others involved in the importation process.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00045-00053.

**REQUEST NO. 13:** All documents and things that refer or relate to the purchase or ordering of packaging with the AMY Logo or AMY Brand.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00054-00070.

REQUEST NO. 14: All documents and things that refer or relate to the creation, design, and appearance of the Subject Hookahs, including the creation design and appearance of

alternatives.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 15:** All documents and things that refer or relate to the creation, design, and appearance of the AMY Logo, including the creation design and appearance of alternatives.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 16:** All documents and things that refer or relate to the creation, design, and appearance of the AMY Brand, including the creation design and appearance of alternatives.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 17:** All documents and things relating or referring to design differences between the Subject Hookahs and any Plaintiff hookah.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 18:** All documents and things that refer or relate to communications between the Defendant and between any person involved in the design, production, shipping, or storage of the Subject Hookahs.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 19:** All documents and things that refer or relate to any complaint from any consumer, Retailer, or Distributor regarding any Subject Hookah or Defendant Product bearing the AMY Logo or AMY Brand.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None.

**REQUEST NO. 20:** All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Registrant objects

to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 21:** All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 22:** All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 23:** All invoices, media, schematics, proofs, drafts, and other documents related to the creation of the AMY Logo or the AMY Brand, including any trademark clearance opinions or contracts with third party branding consultants.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 24:** All documents characterizing any belief by a third party that a MYA Product or a Defendant Product are from a common source (including, believing a MYA Product to be a Defendant Product, vice versa, believing that Plaintiff and Defendant share a common manufacturing source, etc.).

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 25:** All documents characterizing a design of a MYA Product or MYA Trademark.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

REQUEST NO. 26: All documents and things related to the ability of a Retailer or Distributor or end---user to order the Subject Hookahs and Defendant Products (e.g.,

catalogues, product specifications, etc.).

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00071-00138.

**REQUEST NO. 27:** All documents and things that refer or relate to the submission, review, clearance, rejection, approval, or registration with any governmental agency or supplier of any aspect of the Subject Hookahs or the AMY Brand or AMY Logo.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 28:** All documents and things that refer or relate to the costs of manufacturing, acquiring parts and materials for, and Defendant's purchase (if any) of the Subject Hookahs.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00071-00138.

REQUEST NO. 29: All documents and things relating to visits and communications

to any store, retail outlet, or other business engaged in the sale of Defendant Products in the United States visited by any employee, representative, agent, official, executive and/or director of the Defendant for purposes relating to creating or continuing sales of Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 30:** All Documents and things that describe, illustrate, or depict your corporate or organizational structure, or any group assignment, including, but not limited to, organizational charts.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 31:** Documents and things concerning your document retention policies.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 32:** All documents constituting or concerning reports prepared by any expert whom you expect to call at trial, including draft reports.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None.

**REQUEST NO. 33:** All documents provided by you to any expert witness retained by you for this action.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None.

**REQUEST NO. 34:** Any and all statements taken of any person regarding any aspect of Plaintiff's claims or the allegations in this action or any defense to those claims or allegations.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Registrant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 35:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your First Affirmative Defense (Failure to State a Claim).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 36:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Second Affirmative Defense (Absence of Likelihood of Confusion).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents produced herewith, Bates numbered 00001-00143.

**REQUEST NO. 37:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Third Affirmative Defense (Lack of Damages).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 38:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Fourth Affirmative Defense (Estoppel).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Registrant answers this Request as follows: See documents produced herewith, Bates numbered 00139-00143.

REQUEST NO. 39: All documents that relate to, reflect, evidence, or constitute the

factual and/or legal explanation, ground, or rationale for your Fifth Affirmative Defense

(Laches).

SUPPLEMENTAL ANSWER: See General Objections above. Notwithstanding and without

waiving these objections, Registrant answers this Request as follows: See documents produced

herewith, Bates numbered 00139-00143.

REQUEST NO. 40: All documents that relate to, reflect, evidence, or constitute the

factual and/or legal explanation, ground, or rationale for your Sixth Affirmative Defense

(Acquiescence).

SUPPLEMENTAL ANSWER: See General Objections above. Notwithstanding and without

waiving these objections, Registrant answers this Request as follows: See documents produced

herewith, Bates numbered 00139-00143.

Date: May 22, 2015

Respectfully submitted,

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN

BONGINI & BIANCO PL 21355 East Dixie Highway, Suite 115

Miami, Florida 33180

Ph: 305 830-2600

Fax: 305 830-2605

Email: tmmiami@fggbb.com

Attorneys for Registrant

Dabes, Ibrahim

14

## CERTIFICATE OF SERVICE

It is hereby certified that a copy of this SUPPLEMENTAL ANSWERS AND OBJECTIONS TO PETITIONER'S FIRST SET OF REQUESTS FOR PRODUCTION TO REGISTRANT IBRAHIM DABES was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Petitioner, on this 22nd day of May 2015.

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL

# EXHIBIT "H"

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 86/025,182 Published in the Official Gazette (Trademarks) on May 13, 2014.

MYA SARAY, LLC,

Plaintiff,

Opposition No. 91218280

٧.

DABES, IBRAHIM

Defendant.

PLAINTIFF'S FIRST MOTION TO COMPEL

Pursuant to Federal Rules of Civil Procedure 33, 34, and 37, Cancellation-Plaintiff Mya Saray, LLC ("Plaintiff") respectfully moves this Court for an Order compelling Registrant-Defendant ("Defendant") Dabes to provide full and accurate responses to Plaintiff's First Set of Interrogatories and Requests for Production. Plaintiff certifies that it has made a good faith effort, by telephonic conference and correspondence, to resolve with the Defendant the issues presented in the motion and has been unable to reach agreement. In support of its Motion, Plaintiff refers the Court to Plaintiff's accompanying Brief of Law in Support of its First Motion to Compel.

Plaintiff request that this Board:

1. ORDER Defendant to provide full and accurate responses to Plaintiff's First

Set of Interrogatories and Requests for Production generally;

2. STRIKE Defendant's Objections to Plaintiff's First Set of Interrogatories No. 1-

4, 7-10, 12, 14, 16-18, 24-25, 27-28, 30-35, and 37 and Plaintiff's First Set of Requests for

Production No. 3-9, 13-28, and 30-31;

3. ORDER Defendant to reclassify the categories of his discovery disclosures

and answers into appropriate categories pursuant to the standard protective order;

4. ORDER Defendant to correlate which documents are responsive to specific

interrogatories and document requests;

5. RESET discovery dates to ameliorate the effects of Defendant's improper

discovery production; and

6. PROVIDE such other relief as this Board may deem just and proper.

DATED: 5/28/2015

By: /M. Keith Blankenship/

Attorney for Petitioner M. Keith Blankenship, Esq.

Da Vinci's Notebook, LLC

Da Vinci's Notebook, LLC 10302 Bristow Center Dr. #52

Bristow, VA 20136

Ph: (703) 646-1406

keith@dnotebook.com

2

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the forgoing FIRST MOTION TO COMPEL has been served on counsel for Applicant by mailing said copy via First Class Mail, postage prepaid to:

Paul D. Bianco Fleit Gibbons Gutman Bongini & Bianco PL 21355 E Dixie Hwy Ste 115 Miami, Florida 33180-1244 United States

This 28th day of May 2015.

By: M. Kuth Oslandership

# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Seria	ıl No. 86/025	,182	
Published in the Official Gazette (	[Trademarks]	) on May	13, 2014.

MYA SARAY, LLC,

Plaintiff,

v.

DABES, IBRAHIM

Defendant.

PLAINTIFF'S BRIEF IN SUPPORT OF ITS FIRST MOTION TO COMPEL

#### INTRODUCTION AND FACTUAL BACKGROUND

Cancellation-Plaintiff Mya Saray, LLC ("Mya Saray") is a premier hookah manufacturing and distribution company. Cancellation-Defendant Ibrahim Dabes ("Dabes") operates a German hookah distribution company that recently decided to apply the term AMY to its hookahs and hookah accessories. Mya Saray believes that Dabes' use of AMY generally and as particularly as stylized causes confusion with Mya Saray's well-known MYA brand of hookahs and hookah accessories.

Mya Saray is not so enamored with its present litigation position to believe that a pure comparison between its mark, MYA, and Dabes' designation AMY (as stylized) will propel its case unaided through final judgment. Fortunately, the issue before this Board demands an analysis of many factors probative of the story of the marketplace in which MYA and AMY compete, presently or prospectively. *See In re E.l. du Pont de Nemours & Co.*, 476 F.2d 1357 (CCPA 1973)(lists relevant factors). A market's setting can provide context that turns a plausible story of likelihood of confusion into a convincing one; and a convincing story into a damning one. By objecting to discovery ostensibly to all *DuPont* factors other than direct comparison of the designations, Dabes' present discovery tactics seem calculated to block this story.

Mya Saray owns powerful trademarks in the hookah and hookah tobacco industry. Mya Saray is old, respected, and universal; these are the traits that an up-and-comer seeks to associate with its products. Mya Saray's words and phrases are often slavishly copied. See e.g., Mya Saray v. Al-Amir, Inc, et. al., 831 F.Supp.2d 922 (E.D.Va 2011)(Counterfeiter held to counterfeit Mya Saray's word marks and product designs). Mya Saray's products are often slavishly copied. See e.g., Mya Saray v. Zahrah Corp., et. al., Civil Action No. 8:13-cv-01828 (C.D.Ca 2013)(Permanent injunction against copyists of product designs and patent infringers).

Free riders are rarely only copyists; free riders can blend duplicated brands and products with non-duplicates in a symbiotic way. Both the *Zahrah* and *Al-Amir* case mentioned include companies that intermingled copied products and brands with original products and brands to increase the consumer's exposure to and purchase of the latter. Counterfeiters are common for marquee brands like MYA, and Mya Saray seeks the opportunity to show this Board that the AMY name may just be the latest attempt to free ride off of Mya Saray.

Free riders need not be heavy-handed. AMY and AMY (as stylized) are already close enough to MYA (and its stylized sibling marks) to confuse consumers. If Mya Saray can successfully show this Board that Dabes selected AMY and its accompanying stylizations to confuse consumers, then this would be convincing evidence of likelihood of confusion. This evidence may be drawn from the products supplied by Dabes. However, Dabes blocked access to discovery of Dabes' products, excepting production of one catalogue. Evidence of likelihood of confusion may be drawn from instances of actual confusion. Dabes blocked access to discovery of Dabes' records detailing instances of actual confusion. Evidence of likelihood of confusion may be drawn from records of the design of a product identical to one of Mya Saray's products – or that there were no design documents at all, potentially because Dabes purchased products from an existing pipeline of counterfeits. There are other obstructions to rightful discovery, as well as other peculiarities such as a blanket application of "commercially sensitive" to all discovery production – even encompassing answers of "no" or "none." Furthermore, if Dabes' discovery were taken at face value, it would have this Board believe that Dabes has not one drop of correspondence with third parties or internally.

To aid the reader, an index of discovery challenged, its subject matter, and where it is discussed in this brief is presented in <u>Exhibit 3</u>. Mya Saray's original discovery requests are available as <u>Exhibits 4-5</u>.

#### <u>ARGUMENT</u>

I. DEFENDANT'S DISCOVERY RESPONSES ARE UNRESPONSIVE AND ITS OBJECTIONS SEEK TO IMPERMISSIBLY NARROW THE SCOPE OF DISCOVERY.

#### A. Standards of Law

#### 1. Overly Broad

Rule 34 provides that a request must describe with reasonable particularity each item or category of items to be inspected. Fed.R.Civ.P. 34(b)(1)(A). Courts may find that a request is overly broad when it is couched in such broad language as to make deciding which of numerous documents may conceivably fall within its scope to be an unreasonably arduous task. *General Elec. Capital Corp. v. Lear Corp.*, 215 F.R.D. 637, 641 (D.Kan. 2003). A party resisting discovery on the basis that a request is overly broad has the burden to support its objection, unless the request is overly broad on its face. *Id.* at 640. "Mere recitation of the familiar litany that an interrogatory or a document production request is 'overly broad, burdensome, oppressive and irrelevant' will not suffice." *Momah v. Albert Einstein Medical Center*, 164 F.R.D. 412, 417 (E.D.Pa. 1996)(citations omitted).

### 2. Ambiguity

Rule 34 states that a document request "must describe with reasonable particularity each item or category of items to be inspected." Fed.R.Civ.P. 34(b)(1)(A). The test for reasonable particularity is whether the request places the party upon reasonable notice of what is called for and what is not. *Kidwiler v. Progressive Paloverde Ins. Co.*, 192 F.R.D. 193, 202 (N.D.W.V.2000). Therefore, the party requesting the production of documents must provide sufficient information to enable the party to whom the request is directed to identify responsive documents. *Id.* (citing Parsons v. Jefferson-Pilot Corp., 141 F.R.D. 408, 412 (M.D.N.C.1992)). A party that objects to discovery as vague or ambiguous has the burden to

show such vagueness or ambiguity. *Payless Shoesource Worldwide, Inc. v. Target Corp.*, 237 F.R.D. 666, 674 (D.Kan. 2006). A party responding to discovery requests should exercise reason and common sense to attribute ordinary definitions to terms and phrases, and if necessary to clarify its answers, and may include any reasonable definition of the term or phrase at issue. *Id.* at 674-75. A respondent that does not seek clarification or indicate the unclear aspects of the requests waives its objection. *DL v. District of Columbia*, 251 F.R.D. 38, 47 (D.D.C. 2008).

#### 3. Relevance

Discovery under the Federal Rules of Civil Procedure is broad in scope and freely permitted. *Carefirst Of Maryland, Inc. v. Carefirst Pregnancy Centers, Inc.*, 334 F.3d 390, 402 (4th Cir. 2003). Discovery need not be confined to matters of admissible evidence but may encompass that which "appears reasonably calculated to lead to the discovery of admissible evidence." Fed.R.Civ.P. 26(b)(1); *Marker v. Union Fidelity Life Ins. Co.*, 125 F.R.D. 121, 124 (M.D.N.C. 1989). The scope of discovery must be broad in order to provide both sides with all the information necessary for proper and full litigation of all the relevant issues, as well as to eliminate surprise and to facilitate settlement. *Hickman v. Taylor*, 329 U.S. 495, 507-508 (1947).

Rule 26(b)(1) provides, in part, that discovery may be obtained "regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action." Buffington v. Gillette Co., 101 F.R.D. 400, 401 (D.C.Okl. 1980). Relevancy is broadly construed at the discovery stage of litigation and a request for discovery should be considered relevant if there is any possibility that the information sought may be relevant to the subject matter of the action. Id.; Miller v. Doctor's General Hospital, 76 F.R.D. 136 (W.D.Okl. 1977); Biliske v. American Live Stock Insurance Co., 73 F.R.D. 124 (W.D.Okl. 1977); Detweiler Bros. Inc. v. John Graham & Co., 412 F.Supp. 416 (E.D.Wash. 1976); U.S. v. Int'l Business Machines Corp., 66 F.R.D. 215

(S.D.N.Y.1974). Discovery rules are to be accorded a broad and liberal treatment. *Schlagenhauf v. Holder*, 379 U.S. 104 (1964); *Hickman v. Taylor*, 329 U.S. 495 (1947); *Barnett v. Sears, Roebuck and Co.*, 80 F.R.D. 662 (W.D.Okl. 1978). Discovery should ordinarily be allowed under the concept of relevancy unless it is clear that the information sought can have no possible bearing upon the subject matter of the action. *Miller v. Doctor's General Hospital, supra; Marshall v. Electric Hose and Rubber Co.*, 68 F.R.D. 287 (D.Del. 1975).

#### 4. Interrogatory Answers

Each interrogatory must be answered separately and fully in writing under oath. In the interest of narrowing the issues and ascertaining the facts relevant thereto, a court should not permit answers to interrogatories that are incomplete, inexplicit, and unresponsive. Miller v. Doctor's General Hospital, 76 F.R.D. 136, 140 (D.C.Okl. 1977). If the answering party lacks necessary information to make a full, fair and specific answer to an interrogatory, it should so state under oath and should set forth in detail the efforts made to obtain the information. Int'l Fertilizer & Chemical Corp. v. Brasileiro, 21 F.R.D. 193, 194 (S.D.N.Y. 1957) (citing 3 Moore, Federal Practice, Par. 33.26 at p. 2331 (2d ed. 1950)). Depending upon the circumstances, "evasive or incomplete answers are tantamount to no answer at all." Cf. Airtex Corp. v. Shelley Radiant Ceiling Co., 536 F.2d 145, 155 (7th Cir. 1976); see also Minnesota Mining & Mfg. Co. v. Eco Chem, Inc., 757 F.2d 1256, 1260 (Fed.Cir. 1985) (rejecting the argument that interrogatory answers stating "unable to respond" was a response by which the party could avoid the sanction provisions of Rule 37(d)). Furthermore, a party may not make unilateral decisions to narrow the scope of discovery from the scope defined by the seeker of discovery. Wagner v. Dryvit Systems, Inc., 208 F.R.D. 606, 611 (D.Neb. 2001) (citing Laker Airways Ltd. v. Pan American World Airways, 103 F.R.D. 42, 45-6 (D.D.C. 1984)).

#### B. Defendant's Discovery Objections and Answers Are Not Supportable.

1. The Rationale and Documents Relating to Dabes' Selection of Its AMY Logo (as stylized) is Appropriate Discovery.

Mya Saray asked for answers and documents related to Dabes' selection of the AMY (as stylized) mark. Subject matter for this topic is covered in Interrogatory No. 1 (Exhibit 1, pg. 2) and Document Request No. 15 (Exhibit 2, pg. 6). Dabes objected to the relevance of the Interrogatory and Document Request, and without further explanation objected to the Document Request as overly broad and unduly burdensome.

Dabes' intent in selecting AMY is at the focus of this litigation. This board may consider any factor probative of likelihood of confusion, including intent. *DuPont*, 476 F.2d at 1361 and *see Nautilus Group, Inc. v. ICON Health and Fitness, Inc.*, 372 F.3d 1330, 1334-35 (Fed. Cir. 2004)(Intent is probabitive of likelihood of confusion). Wrongful intent is "easy to infer where [a] defendant knew of the plaintiff's mark, had freedom to choose any mark, and 'just happened' to choose a mark confusingly similar to plaintiff's mark." *Dreyfus Fund, Inc. v. Royal Bank of Canada*, 525 F. Supp. 1108, 1121 (S.D.N.Y. 1981) citing 2 J. McCarthy, Trademarks and Unfair Competition § 23:33, at 107 (1973). When a defendant has freedom of choice with full knowledge of a senior user's mark, a court "can readily read into a defendant's choice of a confusingly similar mark the intent to get a free ride upon the reputation of a well known mark." *Id.* This topic is relevant to this proceeding, and Dabes fails to explain any bases for his other objections.

Although Dabes answers the Interrogatory with a facially satisfactory response, he should be made to answer the Interrogatory without objection or reserve information.

2. Discovery of the Rationale and Documents Relating to Dabes' Selection of Its AMY Logo (as stylized) Over Other Alternatives is Appropriate Discovery.

Mya Saray asked for answers and documents related to Dabes' selection of the AMY (as stylized) mark over other trademarks. Subject matter for this topic is covered in Interrogatory No. 2 (Exhibit 1, pg. 3) and Document Request No. 15 and 23 (Exhibit 2, pgs. 6 and 8). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding. This topic is relevant for the same reasons as Interrogatory No. 1, discussed in Subsection I(B)(1). The difference here is that Mya Saray now seeks the specific alternatives that may have been rejected. If there was only one, or if the alternatives were all variations of A-M-Y, then certainly Dabes' intent would be more questionable.

Dabes does not render any satisfactory response at all. Instead, he unilaterally narrows the scope of the question and simply repeats his answer to Interrogatory No. 1. Dabes produced no responsive documents.

# 3. Discovery of Companion Brands Associated with Dabes' Use of its AMY Brand is Appropriate Discovery.

Mya Saray asked for answers and documents related to Dabes' use of other brands in connection with its products, as identified in his trademark application. Subject matter for this topic is covered in Interrogatories No. 3-4 (Exhibit 1, pg. 3). Interrogatory No. 4 goes into greater detail when it further asks the characteristics of purchasers and manufacturing source of products provided under the other Dabes brands. Dabes objects to Interrogatories No. 3 and 4 on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and then to Interrogatory 4 on the basis of being vague, ambiguous, and unduly burdensome.

A factor of likelihood of confusion is the proximity of goods. *DuPont*, 476 F.2d at 1361. Dabes admittedly uses at least two brands. It is common that discrete brands represent goods with different qualities. Mya Saray's MYA brand is a high-end brand; and if Dabes uses his AMY

brand to differentiate one set of products from other products offered under his original Dabes brand, then the difference may be material. *See e.g., Cuisinarts, Inc. v. John Boos & Co.*, 622 F.Supp. 1168 (S.D.N.Y. 1985)(The fact that plaintiff and defendant used similar designations for high-end brands weighed in favor of likelihood of confusion).

If Dabes did indeed fully answer Interrogatory No. 3 without reservation of information, then Mya Saray considers this answer fairly answered. However, there is no attempt to describe in response to Interrogatory No. 4 the characteristics of product quality or prospective purchasers of the alternative brands cited in the Dabes catalogue (which appears to be the only responsive document).

# 4. The Identification of Dabes' U.S. Distributors and Retailers of Its Products and Its Employees Is Appropriately Discoverable.

Mya Saray asked Dabes to identify U.S. distributors and retailers of his products, as identified in his trademark application. Subject matter for this topic is covered in Interrogatory No. 7 (Exhibit 1, pg. 5) and Document Requests 7-8 (Exhibit 2, pg. 4). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome.

Dabes failed to identify any national retailers without disclosing whether any was known to him. Furthermore, evidentiary rules require that Dabes at least explain why it considers the request unduly burdensome – particularly when Mya Saray expressly limits the question to avoid undue burden.¹ Again Dabes cites relevance, but the identification of a potential witness is always relevant. *See e.g., Banks v. Office of Senate Sergeant-at-Arms*, 222 F.R.D. 7 (D.D.C.,2004)(The plaintiff was entitled to discover potential witnesses with knowledge of facts underlying the lawsuit.); *Walls v. International Paper Co.*, 192 F.R.D. 294,

¹ Mya Saray, whose U.S. retailer list is immense, empathizes with producing parties asked to produce mass quantities of information; consequently, Mya Saray asked that Dabes reveal no more than its 20 highest volume retailers, to the extent that the number exceeded 20. (Exhibit 1, pg. 5)

297 (D.Kan 2000)(It was a proper matter to seek the identity of any witnesses with knowledge relating to any underlying claims.)

Furthermore, it is a bedrock principle of trademark law that likelihood of confusion is not based on the similarity of trademarks "in the abstract, but rather in light of the way the marks are encountered in the marketplace and the circumstances surrounding the purchase." *Perfumebay.com Inc. v. eBay Inc.*, 506 F.3d 1165, 1174 (9th Cir.2007) (internal quotation marks omitted). The AMY brand is relatively small and Mya Saray requires assistance in ascertaining the circumstances surrounding purchases of the AMY hookahs. Dabes' refusal to cooperate in discovery in a key issue of a likelihood of confusion analysis interferes with Mya Saray's ability to prove its case.

In Document Requests No. 7-8, Mya Saray asks that Dabes produce documents that reflect a sale of any of Dabes' products with the AMY logo to any retailer or distributor in the United States. Dabes objected on the basis that documents reflecting the sales of its AMY brand products in the United States is irrelevant to the subject matter of the current proceeding. Correspondence from distributors and retailers and the types of AMY brand hookahs requested by the retailers and distributors is highly probative of likelihood of confusion because the desires of commercial purchasers indicate the nature of goods gaining the most traction under the AMY brand. If, for example, more expensive hookahs were desired, then such evidence would show that the AMY brand is most effective at a level of expense comparable to that of the MYA brand. Furthermore, litigation experience shows that distributors will often in correspondence unashamedly simply ask for "MYA lookalikes." Facially, these responses should not be overly broad or unduly burdensome; Dabes discloses in his response to Interrogatories No. 5 and 7 that no products provided under the AMY (as stylized) designation have entered the United States. Dabes unilaterally narrowed the scope of the question to avoid

its substance. If Dabes has a distributor or retailer in the United States for any of the tobacco products identified in his trademark application Mya Saray deserves to know. This will be the starting point of acquiring information related to likelihood of confusion for products that, according to Dabes (through the haze of his multitude of objections), have not yet entered the United States.²

In Document Request No. 30 (Exhibit 2, pgs. 9-10), Mya Saray asks Dabes to provide any organizational charts that may exist in an attempt to ascertain potential witnesses and understand the relationship between any affiliated companies that might exist. Dabes objects to relevance, breadth, and burden. As discussed earlier, nothing could be more natural in discovery than the identification of witnesses and their area of stewardship.

# 5. Hookahs Sold Under The AMY Brand and Their Attributes Are Proper Subjects of Discovery.

Mya Saray asked Dabes to identify the hookahs sold under its AMY brand, including internal names, code names, marketing names, etc., as well as each hookah's first date of sale – and its first date of sale under the AMY brand, if different. Subject matter for this topic is covered in Interrogatory No. 8 (Exhibit 1, pg. 5). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome.

In a curious objection, Dabes declared that the names and attributes of specific hookahs sold under the AMY Brand are irrelevant to the present action. Mya Saray, as does any other trademark litigant, has some investigation ahead of it. A starting point of the investigation is

² In an interesting contrast, Dabes objects to Mya Saray learning of its distributors and retailers in the U.S. for its tobacco products generally (when those specifically branded with AMY (as stylized) are not present), yet also objects to Mya Saray learning any information about his products provided under AMY (as stylized) elsewhere. See e.g., Interrogatories No. 8 and 9 (Exhibit 1, pg. 5)("Applicant objects to portions of this interrogatory that relate to goods sold outside the U.S."). Thus Dabes has neatly boxed out Mya Saray from information about the where the products will be sold in the U.S, and where they are sold elsewhere.

the attributes of the products sold under Dabes trademarks, and Mya Saray needs to know the product names. Once the product names are established Mya Saray can determine such facts as:

- 1. The price points of the products;
- 2. The quality attributes of the products;
- 3. Whether the products have attributes (e.g., use of MYA proprietary coloring) that aid in further confusing consumers into believing that AMY brand products are MYA brand products.
- 4. The location of the products; and
- 5. Criticism of the products;

This comprises a simple list of the information that can be obtained from knowledge of the specific products utilized by Dabes. Furthermore, Mya Saray intends to prove that Dabes is a habitual free rider of Mya Saray's goodwill. The comparison of Dabes product sales history, in the *very abbreviated* form requested by Mya Saray, may demonstrate that he achieves greater sales success with those products that imitate those of Mya Saray.

### 6. Distribution Pricing and MSRP are Appropriately Discoverable.

Mya Saray asked Dabes to identify the <u>Manufacturer's Suggested Retail Price</u> and distribution price for its hookahs. Subject matter for this topic is covered in Interrogatory No. 9 (<u>Exhibit 1</u>, pg. 5). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome.

The price point of an infringing product is always relevant to a likelihood of confusion analysis. Once again, Dabes cites the unduly burdensome nature of Mya Saray's request for information without bothering to explain the basis. Here, Dabes takes exception to Mya Saray's request for the distribution prices and MSRP of its hookahs. Mya Saray is puzzled as to how this is burdensome, or even unduly so; it is a standard practice in the distribution of any good to provide an MSRP to the retailer and have (and track) standard distribution pricing.

### 7. U.S. Sales Quantity of Dabes' Hookahs is Appropriately Discoverable.

Mya Saray asked Dabes to provide the sales quantities of its hookahs by year. Subject matter for this topic is covered in Interrogatory No. 10 (Exhibit 1, pgs. 5-6). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome.

Again Dabes objects to relevance and burden without the slightest explanation. With modern bookkeeping programs, a suitable report is seemingly a few keystokes away. Dabes' abbreviated sales history of his hookahs, provides circumstantial evidence of his intent, and indicates his level of success in copying Mya Saray. Dabes purports to answer this question via document production, but again, Mya Saray can find no such documents. Again, Dabes provides no Bates reference

## 8. The Extent of Trademark Search by Dabes' May Be Appropriately Discoverable.

Mya Saray asked Dabes to describe the extent to which it searched for trademarks that might impede its use of AMY (as stylized). Subject matter for this topic is covered in Interrogatory No. 12 (Exhibit 1, pg. 6). Dabes objects based on relevancy and privilege and/or attorney work product. Although Mya Saray understands that the substance of a report may be subject to privilege, that privilege is waived if Dabes intends to use the substance of the report as a defense in this action. The relevance of any report or search, however, is unquestionable. Mya Saray requests an instruction from this Board that if Dabes intends to use any search of existing trademarks, that he disclose its contents in discovery.

## 9. Information Received by Dabes Referring to or Inquiring about Mya Saray is Properly Discoverable.

Mya Saray asked Dabes to describe communications to it, or within his organization, inquiring about, or referring to, Mya Saray or its products. Subject matter for this topic is covered in Interrogatory No. 16 (Exhibit 1, pg. 8) and Document Request No. 25 (Exhibit 2, pg. 9). Dabes objected on the basis of relevance to the subject matter of the litigation. The answer to this question is the starting point to so much relevant information that it is confounding that it was objected to on the basis of relevance. An answer may lead to:

- Information related to Dabes' knowledge of Mya Saray. See Beer Nuts v. Clover Club Foods Co., 805 F.2d 920 (10th Cir. 1986) (The "deliberate adoption of a similar mark may lead to an inference of intent to pass off goods as those of another which in turn supports a finding of likelihood of confusion."); Wynn Oil Co. v. American Way Serv. Corp., 943 F.2d 595 (6th Cir. 1991) ("Understandably, courts have held that use of a mark with knowledge of another's prior use supports an inference of intentional infringement." Intentional infringement was found.); Daddy's Junky Music Stores, Inc. v. Big Daddy's Family Music Ctr., 109 F.3d 275 (6th Cir. 1997) ("the use of a contested mark with knowledge of the protected mark at issue can support a finding of intentional copying").
- Information related to reported instances of actual confusion. Resorts of Pinehurst, Inc. v. Pinehurst National Corp., 148 F.3d 417 (4th Cir 1998) (substantial evidence of actual evidence supports finding of summary judgment of likely confusion and infringement). See Restatement Third, Unfair Competition § 23, comment b (1995) ("[T]he existence of actual confusion is direct evidence that in the market context of their actual use the similarities of the two designations are sufficient to create confusion. ... [C]onvincing evidence of substantial actual confusion is ordinarily decisive.").

Dabes purportedly answered the question, but refers merely to a cease-and-desist letter sent by Mya Saray to Dabes (and the complaint for this proceeding). It is unlikely that Dabes received no inquiries related to its AMY brand and the MYA brand, and Mya Saray asks that Dabes' objection be struck to reveal such additional inquiries as may be present.

# 10. Trade Shows Attended by Dabes Where Dabes Marketed His Products is Properly Discoverable and His U.S. Visits to Retailers/Distributors.

Mya Saray asked Dabes to identify the trade shows that he has attended within the last four years where he marketed the products of his trademark application, and any retailers or distributors in the U.S. that he has visited. Subject matter for this topic is covered in Interrogatory No. 17 (Exhibit 1, pg. 8) and Document Request No. 29 (Exhibit 2, pg. 10). Dabes

objects to the Document Request and Interrogatory on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further to the Document Request based on breadth and burden. The channels of trade and media through which a defendant markets its products is not only relevant, but a prominent factor of likelihood of infringement. If by his objection, Dabes provides an incomplete answer he will work a substantial injustice in this litigation. *See Freedom Card, Inc. v. JPMorgan Chase & Co.*, 432 F.3d 463, 471 (3d Cir.2005)(Whether goods are marketed through the same channels of trade and advertised through the same media is probative of likelihood of confusion.). Dabes answered; however, the objections should nonetheless be struck to ensure a complete reply.

# 11. Instances and Reports of Actual Confusion Known to Dabes Are Properly Discoverable.

Mya Saray asked Dabes to identify instances and reports of actual confusion and customer complaints. Subject matter for this topic is covered in Interrogatory No. 18 (Exhibit 1, pg. 8) and Document Requests No. 19 and 24 (Exhibit 2, pg. 7 and 9). Dabes objects to the interrogatory and document requests on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome, vague, and ambiguous.

Mya Saray pointedly asks Dabes to identify individuals known to it within its organization that have knowledge of instances of actual confusion between MYA and AMY. Again without benefit of supporting rationale, Dabes objects, finding unexplained ambiguity and vagueness in the question. Furthermore, Dabes believes that evidence related to actual confusion is irrelevant. As the existence of actual confusion is a *DuPont* factor, Mya Saray believes it should be allowed discovery into the matter. *DuPont*, 476 F.2d at 1361. Notwithstanding the multiple objections created by the present Interrogatory, Dabes nonetheless decided to answer the Interrogatory. His answer: "none." This is a curious answer

since Dabes also objected on the basis that answering the question was unduly burdensome, and only supports the logical inference that there Dabes is withholding an answer shielded by his objection.

### 12. The Nature of Dabes' Trade Channels is Properly Discoverable.

Mya Saray asks Dabes to describe the trade channels of his AMY brand products identified in his trademark application. Subject matter for this topic is covered in Interrogatory No. 24 (Exhibit 1, pg. 11-12). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome.

The channels of trade and media through which a defendant markets its products is not only relevant, but a prominent factor of likelihood of infringement. If by his objection, Dabes provides an incomplete answer he will work a substantial injustice in this litigation. "The similarity or dissimilarity of established, likely-to-continue trade channels" is a factor in any analysis of likelihood of confusion. *DuPont*, 476 F.2d at 1361. Dabes answered, but again, did so under reservation of objection.

### 13. Dabes' Sales and Advertising Literature is Properly Discoverable.

Mya Saray asks Dabes to identify his sales and advertising literature. Subject matter for this topic is covered in Interrogatory No. 25 (Exhibit 1, pg. 12). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome. In an answer reminiscent to its answer to Interrogatory No. 18 (See Subsection I(B)(11)), Dabes suggests that this answer requires undue burden – and then answers simply "none." Furthermore, Dabes suggests that identifying its U.S. advertising literature is irrelevant to the present proceeding. This logic is erroneous for essentially the

same reason as Dabes' relevance objection to Interrogatory No. 17 was erroneous. (See Subsection I(B)(10)).

### 14. Dabes' Sales and Advertising Budget is Properly Discoverable.

Mya Saray asks Dabes to list his advertising media and his budget therefor in the United States. Subject matter for this topic is covered in Interrogatory No. 27 (Exhibit 1, pg. 12). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome. Although Dabes decries this as irrelevant to the litigation, the extent of his advertising is probative of such issues as actual confusion and the length of time under which there has been concurrent use without evidence of actual confusion. Dabes lack of advertising expenditures, for example, may provide an explanation as to no or minimal actual confusion.

Dabes once again couples an objection to the undue burden in acquiring an answer to a laconic answer: "No advertising in other media and no expenditures." Facially this answer seems rather easy, and certainly not a burden, much less an undue burden.

### 15. Dabes' Sales for Each Product Sold under His AMY Brand is Properly Discoverable.

Mya Saray asks Dabes to list by product his sales in the United States under his AMY brand. Subject matter for this topic is covered in Interrogatory No. 28 (Exhibit 1, pgs. 12-13). Dabes objects on the basis that the information sought is not relevant to the subject matter of the pending proceeding, and further that it is unduly burdensome and vague.

Dabes states that the Interrogatory is vague, but fails to explain which part is vague. Dabes uses product identifiers approved by this U.S. Patent and Trademark Office and the terms "sales" and "by year" and "United States" seem facially self-explanatory. Furthermore, Dabes states the Interrogatory is unduly burdensome, but this again seems like one of the questions that can be answered by most bookkeeping programs with a few keystrokes. In

response to Dabes' objection of the relevance of this Interrogatory to the subject matter of this litigation, it is important to understand the sales footprint of Dabes listed products in determining the existence of actual confusion and other issues (e.g., variety of goods).

### 16. Dabes' Use of Counterfeit Hookahs is Strongly Indicative of his Bad Intent and is Properly Discoverable.

Mya Saray asks Dabes to provide information related to two of his hookahs, hookahs that Mya Saray considers to be counterfeits of its own products. Mya Saray, as a marquee provider of hookahs throughout the world, is the target of highly organized counterfeiting. *See e.g., Al-Amir, Inc.,* 831 F.Supp.2d at 934. Use of Mya Saray counterfeits provides new distributors a simple, almost-turnkey entry into the hookah market. It would certainly be an indication of bad faith if Mya Saray were to prove that Dabes' freeriding experiment with Mya Saray counterfeits was so successful that it attempted to take the extra step to create non-identical, but nonetheless confusing, imitations of the MYA wordmark and logos. The coupling of counterfeit goods with a confusing, but non-identical, brand is a common tactic of free riders. *See e.g., Louis Vuitton Malletier and Oakley, Inc. v. Vei*, 211 F.Supp.2d 567, 578 (E.D.Pa 2002)(A counterfeiter was found to have bad intent when it sold counterfeit goods under a domain name similar to plaintiff's trademark). Mya Saray throughout its discovery refers to the counterfeit hookahs as "Subject Hookahs."

Interrogatories No. 14 and 30-32 (Exhibit 1, pgs. 7 and 13-14) and Document Requests No. 3-6 and 14, and 20-22 (Exhibit 2, pgs. 3-8) ask such questions as who created the Subject Hookahs (*i.e.*, Dabes or a third party), who manufactures them, the sales of the Subject Hookahs within the U.S., where the Subject Hookahs were sold, and other related issues. Interrogatory No. 14 seeks identification of the designers of Dabes' hookahs generally, for if nothing else, juxtaposition. (Exhibit 1, pg. 7). Document Request No. 26 asks the mechanism (e.g., online

order forms, dealer registration documents, etc.) for ordering the Subject Hookahs. Contrary to Dabes' objections as to these Interrogatories' capacity to lead to relevant evidence, these questions are relevant because that are *highly* probative of bad intent. Dabes object as to the undue burden required in answering these Interrogatories, but fails to explain the basis. Furthermore, Dabes cites general objections but fails to explain how they might apply. This is improper and such general objections should be struck on their face. *See Gassaway v. Jarden Corp.*, 292 F.R.D. 676, 680 (D.Kan. 2013)("General objections to discovery requests are considered overly broad and worthless unless the objections are substantiated with detailed explanations.") and *Jackson v. CCA of Tennessee, Inc.*, 254 F.R.D. 135, 138-39 (D.C. 2008)("When faced with general objections, the applicability of which to specific document requests is not explained further, this Court will not raise objections for the responding party, but instead will overrule the responding party's objection on those grounds.").

In his response to Interrogatories No. 14 and 30, (Exhibit 1, pg. 13) and Document Request No. 18 (Exhibit 2, pg. 6) Dabes answers a question *not asked*. Rather than identify the creator, designer, etc. of the Subject Hookahs, Dabes answered the question of who created, designed, etc. hookahs branded with the AMY GOLD TOBACCO MOLASSES logo. Dabes disclosed no documents at all. The question of the source, and other pertinent information, of the counterfeits and the success Dabes may have enjoyed with them is probative of his bad faith.

Dabes' response to Interrogatory No. 31, (Exhibit 1, pg. 14) and Document Request No. 28 again answers a question not asked. Dabes responds only to hookahs that may have been distributed with the AMY GOLD TOBACCO MOLASSES logo. In response to Interrogatory No. 32, (Exhibit 1, pg. 14) and Document Request No. 17 (Exhibit 2, pg. 6) Dabes provides no substantive answer. In Interrogatory No. 33, (Exhibit 1, pgs. 14-15) and Document Request No.

17 (Exhibit 2, pg. 6) Mya Saray inquires as to the differences between one of Mya Saray's hookahs and a Dabes hookah with the internal reference number of AMY---018. Dabes fails to answer and does so under multiple vague objections. These unexplained objections should be struck.

In Interrogatory No. 34, (Exhibit 1, pg. 15) Mya Saray inquires as to the differences between one of Mya Saray's hookahs³ and a hookah described by Dabes in his catalogues⁴ as JINN. Dabes provided the litany of objections described above and refused to provide any difference, once again impermissibly narrowing the question's scope.

All objections to Interrogatories and Document Requests involving the Subject/Counterfeit hookahs should be struck. The topic is simple, being restricted to two products, and highly probative of a central matter in this proceeding.

#### 17. Dabes' Lost and Unavailable Documents are Properly Discoverable.

When in Interrogatory No. 35, (Exhibit 1, pg. 15) Mya Saray requested the identity of lost documents or unavailable documents that would have otherwise have been produced in response to one of the other Interrogatories, Dabes objected generally, that they might be the basis of work product and/or attorney-client privilege. The general objections should be stricken for reasons described elsewhere in this brief. The objections as to work product and/or attorney-client privilege on the other hand are perplexing. Defendant should be made to explain why the documents that it does not have cannot be viewed for reasons of work product or attorney-client privilege.

³ Specifically the QT hookah. The QT hookah has achieved such sales prominence that it supports its own trademark for its product configuration. See U.S. Trademark Reg. No. 3,845,276.

⁴ The catalogue was not produced by Dabes in its discovery responses, although Mya Saray asked for his sales literature. Instead, Mya Saray discovered the catalogue when one of its distributors alerted it to the fact that Dabes was attempted to sell its counterfeits in the U.S. This withholding of evidence epitomizes the danger in allowing Dabes to unilaterally alter the scope of proper discovery requests, and answers conditioned on ongoing objections.

Furthermore, Dabes objects strongly to the Mya Saray's Document Request No. 31 (Exhibit 2, pg. 31), which seeks documents concerning Dabes document retention policies. Document retention policies are appropriate targets of discovery. *Huthnance v. District of Columbia*, 255 F.R.D. 285, 287 (D.D.C.2008). Dabes' objections should be struck.

### 18. Dabes' Attempts to Validate its Trademarks is Properly Discoverable.

In Interrogatory No. 37 (Exhibit 1, pg. 16), Mya Saray seeks information on focus group testing, research, or other types of sophisticated analysis of the potential for confusion between the AMY and MYA brands. Defendant objected on the basis that such analysis would be irrelevant. Attempts to discern confusion through focus groups, studies, etc. can be highly probably of likelihood of confusion. *Edina Realty, Inc. v. TheMLSonline.com*, 80 U.S.P.Q.2d 1039, 2006 WL 737064 (D. Minn. 2006) (court denied motion to exclude evidence based on "consumer behavior and marketing" based on focus groups, empirical studies on general Internet usage, and statistics tracking consumer use of defendant's sponsored link).

### 19. Physical Specimens of Dabes are Appropriately Discoverable.

In Request No. 9 (Exhibit 2, pgs. 4-5), Mya Saray requests two physical specimens, the Subject (i.e., counterfeit) Hookahs. Without benefit of explanation, Dabes decries this disclosure of the two hookahs, each about the size of an American football, as unduly burdensome and overly broad. Rather than respond with the specimens or the location at which Mya Saray might examine them, Dabes responds by stating "No documents requested." A litigant is entitled to examine physical evidence relevant to its claim. *See Mirchandani v. Home Depot, U.S.A., Inc.*, 235 F.R.D. 611, 615-16 (D. Md. 2006)(Defendant ordered to provide specimens of locking bolts to plaintiff) and *Ostrander v. Cone Mills, Inc.*, 119 F.R.D. 417, 420 (D.Minn.1988) (allowing destructive testing of fabric swatches of nightwear alleged to have failed federal flammability standards). In a further attempt to evade the Request Dabes points

ambiguously to his disclosure of Request No. 1 for Mya Saray to examine "photographs that show goods marked with the AMY DELUXE (DESIGN) mark." There is no indication of which documents include the Subject Hookahs. Dabes should be made to answer the question with particularity, if not by Bates Number. Again, Dabes wrongfully altered the scope of the discovery request.

## 20. The Creation of Dabes' Packaging for Its AMY Brand is Properly Discoverable.

In Document Request No. 13 (Exhibit 2, pg. 6), Mya Saray asks for documents and things related to the purchase and ordering of packaging with the AMY Logo or AMY Brand. Without providing a basis, Dabes states that this Request is overly broad and unduly burdensome. Whether Dabes acquires his packaging from foreign third-party manufacturers in the business of organized counterfeiting, or from U.S. or German brand designers is highly probative of likelihood of confusion.

Although Dabes claims to have submitted documents responsive to this Request, Mya Saray cannot ascertain with any reliability that Dabes disclosed any such documents.

# 21. Submission, Review, and Registration Documents of AMY Trademarks or the Subject Hookahs are Appropriately Discoverable

In Document Request No. 27 (Exhibit 2, pg. 10), Mya Saray asks for documents and things related to the official review and registration of the AMY brand, AMY Logo, and the Subject Hookahs. Dabes objected to this request as overly broad, unduly burdensome, and not calculated to lead to relevant evidence. Statements made during prosecution of a trademark are naturally relevant; and Dabes provides no explanation for the other objections. Interestingly, Dabes' answer to this Request is "None." This is an odd answer because the basis of his U.S. trademark filing is a German trademark application.

#### II. General Document Disclosure Tactics by Dabes Are Improper

### A. The General Document Disclosure Tactics by Dabes Are Improper

Dabes makes only a single disclosure pursuant to the forty document requests propounding by Mya Saray. Admittedly, this single disclosure was responsive to Mya Saray's first request for disclosure, and because it requested documents identified in the course of answering Plaintiff's First Set of Interrogatories is quite broad. However, the disclosure includes approximately 20 documents, and certainly does not cover the topics of the other document requests. Nonetheless, every subsequent response by Dabes is either (i) "None" or (ii) claims to be already disclosed responsive to Request No. 1. Such a response mechanism obfuscates which documents are responsive to which requests; and nowhere in the response is there a reference either to a particular document, for example by Bates Number, or range of documents. This is improper. *See e.g., DIRECTV, Inc. v. Puccinelli,* 224 F.R.D. 677, 682 (D.Kan.2004)(Because "there is no indication Plaintiff produced any of the requested documents as they are kept in the usual course of business...Plaintiff was required to identify the particular documents or to organize and label them to correspond to these specific requests.")

## B. A Blanket Reference to All Discovery Production as "Commercially Sensitive" is Improper.

The Parties are subject to this Board's standard protective order. Every Interrogatory answer, include the "None" and "No response" answers, and every document disclosed, including consumer-facing marketing materials (and opposing counsel's signature and certificate of service) were labeled as commercially sensitive. *See Exhibits 1 and 2*, generally. Even though a blanket protective order permits all documents to be designated as confidential, a party must agree to only invoke the designation in good faith. *Gillard v. Boulder Valley School Dist. Re.-2*, 196 F.R.D. 382, 386 (D.Colo. 2002). While the party challenging a designation under

a protective order has the burden of identifying instances of improper classification, the

burden of proving confidentiality remains with the party asserting the claim. Id. To be sure,

plenty of information provided by Dabes may be commercially sensitive; Dabes discloses, for

example, two Chinese third-party manufacturers and invoices to distributors.

information, such as product catalogues and descriptions of their products, are less suitable for

protection. This Board should require Dabes to reconsider the categories into which his

discovery production fits.

III. CONCLUSION

Dabes discovery disclosures are riddled with facially unsupportable objections, and in

some instances perplexing objections and objections immediately contradicted by the answer.

Dabes frequently answers questions not asked. Dabes seems to have decided that this case

should be decided by a single inquiry, a comparison of AMY to MYA, and has refused to answer

any interrogatories applicable to any other DuPont factor. There is not a single explanation for

any objection. There are no references to the specific documents produced for any response.

Dabes' blanket application of the highest level of protection available under the protective

order is unnecessarily restrictive and highly suspect. This Board should grant Mya Saray's

motion to compel and require Dabes to respond to its discovery.

DATED: 5/28/2015

By: /M. Keith Blankenship/

Attorney for Petitioner

M. Keith Blankenship, Esq. Da Vinci's Notebook, LLC

10302 Bristow Center Dr. #52

Bristow, VA 20136

Ph; (703) 646-1406

keith@dnotebook.com

23

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the forgoing PLAINTIFF'S BRIEF IN SUPPORT OF ITS FIRST MOTION TO COMPEL has been served on counsel for Applicant by mailing said copy via First Class Mail, postage prepaid to:

Paul D. Bianco Fleit Gibbons Gutman Bongini & Bianco PL 21355 E Dixie Hwy Ste 115 Miami, Florida 33180-1244 United States

This 28th day of May 2015.

By: M. Keith Blankenship

### EXHIBIT "I"

UNITED STATES PATENT AND TRADEMARK OFFICE

Trademark Trial and Appeal Board

P.O. Box 1451

Alexandria, VA 22313-1451

General Contact Number: 571-272-8500

Mailed: May 19, 2015

Opposition No. 91218280

Mya Saray, LLC

v.

Ibrahim Dabes dba Dabes Egyptian Imports

George C. Pologeorgis, **Interlocutory Attorney:** 

On January 20, 2015, Applicant filed a "consented" motion to amend the

identification of goods of its involved application Serial No. 86025182. By the

proposed amendment Applicant seeks to amend the identification of goods from

"tobacco; smoking articles, namely, cigarettes, cigars, smoking pipes, and shishas"

to "tobacco."

By order dated January 26, 2015, the Board approved the "consented" motion to

amend and allowed Opposer time in which to file a withdrawal of the opposition

based upon the approved amendment.

On February 25, 2015, Opposer filed a response to the Board's order maintaining

that, based upon its previous communications with Applicant, it only provided

consent to the amendment of the involved application if Applicant would also

amend the identification of goods of a registration owned by Applicant and which is

subject to a related proceeding involving the parties herein, namely, Cancellation

No. 92060249. Because Applicant never filed a corresponding motion to amend the identification of goods of the subject registration to Cancellation No. 92060249, Opposer, by way of its response, is effectively withdrawing its consent to the proposed amendment of the identification of goods concerning Applicant's involved application Serial No. 86025182, and requests that the Board withdraw its January 26, 2015, order.

On March 13, 2015, Applicant filed a response to Opposer's response contending that, based upon its own understanding regarding the parties' communications, Opposer did provide consent to its proposed amendment of the identification of goods of involved application in this matter without any condition that Applicant would also file a motion to amend the identification of goods of its registration subject to related Cancellation Proceeding No. 92060249.

Based on the foregoing, the Board finds that there has been a clear misunderstanding and/or miscommunication between the parties regarding the circumstances under which Opposer would provide its consent to Applicant's proposed amendment to its application Serial No. 86025182 which is subject to this opposition proceeding. In light of such miscommunication/misunderstanding, the Board construes Applicant's motion to amend filed on January 20, 2015 as an unconsented motion.

In view thereof, the Board's January 26, 2015, order is hereby **VACATED** and consideration of Applicant's motion to amend filed on January 20, 2015 (which the Board now construes as an unconsented motion to amend) is hereby deferred until

final decision or until the case is decided upon summary judgment.¹ See TBMP § 514.03 (2014).

#### **Trial Schedule**

In light of the delay in considering the parties' filings regarding Applicant's motion to amend, trial dates are reset as follows:

Discovery is open.

Expert Disclosures Due	9/20/2015
Discovery Closes	10/20/2015
Plaintiff's Pretrial Disclosures	12/4/2015
Plaintiff's 30-day Trial Period Ends	1/18/2016
Defendant's Pretrial Disclosures	2/2/2016
Defendant's 30-day Trial Period Ends	3/18/2016
Plaintiff's Rebuttal Disclosures	4/2/2016
Plaintiff's 15-day Rebuttal Period Ends	5/2/2016

In each instance, a copy of the transcript of testimony, together with copies of documentary exhibits, must be served on the adverse party within thirty days after completion of the taking of testimony. Trademark Rule 2.125.

Briefs shall be filed in accordance with Trademarks Rules 2.128(a) and (b). An oral hearing will be set only upon request filed as provided by Trademark Rule 2.129.

¹ In light of the Board's ruling herein, the identification of goods of Applicant's involved application Serial No. 86025182 will revert back to the identification as originally-filed, namely, "tobacco; smoking articles, namely, cigarettes, cigars, smoking pipes, and shishas."

### EXHIBIT "J"

### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application No.	86/025,182			
For the Mark: AMY	GOLD TOBACCO	) MOLAS	SES (design)	
Published in the Office	<i>cial Gazette</i> on Ma	y 13, 2014	,	
Mya Saray, LLC,		)		
		)		
	Opposer,	)	Opposition No.: 91218280	
		)		
V.		)		
		)		
Dabes, Ibrahim DBA		)		
Dabes Egyptian Impo	orts,	)		
		)		
	Applicant.	)		

### SUPPLEMENTAL ANSWERS AND OBJECTIONS TO OPPOSER'S FIRST SET OF INTERROGATORIES TO APPLICANT IBRAHIM DABES

Applicant incorporates by reference the preliminary statement and General Objections made to the original set of Response and Objections to Opposer's First Set of Interrogatories to Applicant Ibrahim Dabes.

#### SUPPLEMENTAL ANSWERS TO INTERROGATORIES

**INTERROGATORY NO. 1**. Explain why (including the inspiration, significance, and meaning) Defendant selected the designation "AMY" as a brand for Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY GOLD TOBACCO MOLASSES (design) because AMY is the name of Applicant's daughter. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 2**. Explain the rationale for adopting the designation "AMY" in connection with Defendant's Products and why "AMY" was selected over alternative designations, with specific reference to those designations.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY GOLD TOBACCO MOLASSES (design) because AMY is the name of Applicant's daughter. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 3**. If Defendant utilizes alternative brand designations in connection with Defendant Products, identify such alternative brand designations by its literal elements (e.g. words) and design elements (e.g., illustrated components).

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 4**. Explain other inspiration and meaning of the alternative brand designations responsive to INTERROGATORY NO. 3 how the Products for such other alternative brand designations relate to Defendant Products sold under the AMY Brand with specific reference to Defendant Product quality, Defendant Product quantity (generally at this time), Defendant Product manufacturing source, the characteristics of prospective purchasers of the Defendant Products, and other significant criteria.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products

have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 5**. Identify the manufacturing source of the Defendant Products under the AMY Brand, (i) if manufactured by a third party, by name and location, and (ii) if manufactured by Defendant, by address and manager of factory?

ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 6** Describe the importation of Defendant's Products into the United States with specific reference to the:

- a. identities of customs brokers, warehousing, transport and shipping parties, handlers, and delivery agents;
- b. dates of importation, by arrival into the United States;
- c. quantities of Products divided into categories thereof (e.g., hookahs, hookah tobacco, etc.)

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

INTERROGATORY NO. 7. Identify each Distributor and Retailer known to Defendant authorized to sell Defendant Products in the United States. For each Distributor, include the

geographic area, if any, to which the Distributor is permitted to distribute. (To the extent that the answer to this questions calls for the identification of more than 20 retailers, then Defendant need only list the 20 highest volume retailers)

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 8**. Identify each hookah sold under the AMY Brand (including all internal names, code names, marketing names, and any other unique designations) and each hookah's date of first sale anywhere in the world, and its date of first sale under the AMY Brand, if different.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Applicant objects to the portions of this interrogatory that relate to goods sold outside the US. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 9**. Identify the average distribution price and manufacture's suggested retail price, if any, of each hookah of INTERROGATORY NO. 8.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. In addition, Applicant objects to the portions of this interrogatory that relate to goods sold outside the US. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 10.** Identify the sales quantity in the United States of each hookah of INTERROGATORY NO. 8 by year.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 11**. Did you consider the affects of using the name AMY on Defendant Products notwithstanding Plaintiff's use of MYA with Plaintiff Products, and if so, what factors did you consider to be related to dispelling confusion?

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: "AMY" was selected to be part of the mark AMY GOLD TOBACCO MOLASSES (design) because AMY is the name of Applicant's daughter. Never gave any consideration to MYA as it is completely different and not confusing with regards to Applicant's use of the mark AMY GOLD TOBACCO MOLASSES (design). This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 12.** Describe the extent to which Defendant searched for marks that might impede the use or registration of any AMY Brand for Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds that it seeks information that is irrelevant, privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The application is based on German Registration No. 302012000345 under Section 44(e) of the Trademark Act. It is Applicant's understanding that a search was

conducted by the German Patent and Trade Mark Office before the foreign mark was registered. Additionally, the USPTO conducted a search which revealed that there were no registered or pending marks, including those allegedly owned by Opposer, that would bar registration of Applicant's mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 13**. Identify the individuals most knowledgeable about the advertising, marketing, and/or promotion of each hookah of INTERROGATORY NO. 8.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 14.** Identify the individual most knowledgeable about the appearance and aesthetic properties of each hookah of INTERROGATORY NO. 8.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 15**. Describe in detail the date and circumstances under which Defendant first learned of each of the MYA Trademarks, including but not limited to, the persons that became aware of each of the MYA Trademarks, and all steps and actions taken, with respect to the design, development, offer for sale, and sales of Defendant Products identified in response to INTERROGATORY NO. 8, including any efforts by Defendant to avoid confusion between MYA Trademarks and the AMY Brand.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: Applicant cannot recall an exact date; however, on or about September 13, 2013 Applicant's attorney responded to a cease and desist letter from Opposer asserting there was no likelihood of confusion. See documents produced in response to Opposer's First Set of Requests for Production. No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 16**. Identify each and every person with knowledge of any and all instances where Defendant received mail, orders, deliveries, telephone calls, bill, payments, invoices, or any other communications referring to or inquiring about either Plaintiff or the MYA Trademarks.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: On or about September 13, 2013 Applicant's attorney responded to a cease and desist letter from Opposer asserting there was no likelihood of confusion. The undersigned received a notice from the Trademark Trial and Appeal Board of the Notice of Opposition filed against the subject application via email on September 10, 2014. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 17**. Identify all trade shows attended by Defendant, including name of trade show, date, and location, within the past four (4) years in which Defendant marketed Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant

answers this Interrogatory as follows: Applicant attended the TPC 2014 trade show in Las Vegas, Nevada 29.01-30.01.2014.

**INTERROGATORY NO. 18**. Identify each and every person with knowledge of any and all instances where Defendant obtained any knowledge or information regarding any confusion whatsoever on the part of any person about the source, affiliation, or sponsoring of any of Plaintiff Product and the source, affiliation, or sponsoring of Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None.

**INTERROGATORY NO. 19**. State in detail all facts upon which Defendant bases its denial of likelihood of confusion of any of the MYA Trademarks and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and thins relating to any such facts, including information that refutes Defendant's denial.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The marks are dissimilar in appearance, sound, connotation, commercial impression and any other factors which could have a bearing on the fact of no likelihood confusion in the marketplace. Trademark Examining Attorney assigned to the subject registration concluded on November 21, 2013 that there were no registered or pending marks, including those allegedly owned by Opposer, that would bar registration of Applicant's mark. Simply because the respective marks have three letters in common does not mean that confusion, mistake or deception as to the source of the products is likely. Additionally, Applicant's mark includes the additional terms "GOLD TOBACCO MOLASSES" and the respective design elements that further preclude any likelihood of confusion.

**INTERROGATORY NO. 20**. State in detail all facts upon which Defendant bases any defense raised by Defendant in this action and provide the identity of all individuals with knowledge of any such facts, and the identity of documents, communications, and things relating to any such facts, including information that refutes Defendant's denial.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, ambiguous, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The marks are dissimilar in appearance, sound, connotation, commercial impression and any other factors which could have a bearing on the fact of no likelihood confusion in the marketplace. Trademark Examining Attorney assigned to the subject registration concluded on November 21, 2013 that there were no registered or pending marks, including those allegedly owned by Opposer, that would bar registration of Applicant's mark. Simply because the respective marks have three letters in common does not mean that confusion, mistake or deception as to the source of the products is likely. Additionally, Applicant's mark includes the additional terms "GOLD TOBACCO MOLASSES" and the respective design elements that further preclude any likelihood of confusion.

**INTERROGATORY NO. 21**. State the exact date(s) on which Defendant will rely as to when its use of the AMY Logo commenced in connection with the sale or distribution of each constituent (e.g., cigarettes) of the Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 22**. Identify all documents, purchase orders, invoices, labels, flyers, brochures, other advertising or any writing whatsoever that Defendant will rely upon to establish the date(s) specified in answer to INTERROGATORY NO. 21.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 23**. With respect to the first use(s) of the marks of the AMY Logo in connection with the sale of each product and/or service identified in above INTERROGATORY NO. 21, state:

- (a) Each manner in which the applied---for designation was used, e.g. by affixing to containers, labels, or in newspaper advertising or fliers;
- (b) If the applied---for designation was printed on containers for the product or on labels, the name and address of the person(s) or organization(s) which printed them;
- (c) If the applied---for designation was used in brochures or fliers, the name and address of the person(s) or organization(s) which printed them;
- (d) If the applied---for designation was used in media advertising, the name and address of the person(s) or organization(s) which advertised them:
- (e) Whether the product and/or service was sold;
- (f) Whether the product and/or service was offered free of charge;
- (g) The name and address of the person(s) or organization(s) to whom the product and/or service was sold; and
- (h) Whether the sale of each product under the applied---for designation has been continuous from each date specified in above INTERROGATORY NO. 21 to the present.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark, nor given away for free. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 24**. Describe and identify the channels of trade in the United States of each Product.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 25.** Identify each item of sales literature, including brochures and fliers produced by or for Applicant for distribution in the United States to advertise each of the Products.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 26**. List all geographic areas (by city and state) in which Applicant sells each of the Products.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 27**. List all other media, not already identified, where Applicant has advertised each of the Products, state the amount expended by Defendant in the United States in the advertisement of each Product.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No advertising in other media and no expenditures. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 28**. For each calendar year since commencement of use the AMY Brand or applied-for-designation in connection with the sale of each of the Products, state the amount of sales by Defendant in the United States of each of the Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is vague, unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No products have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 29**. Identify the Defendant's predecessors-in-interest, and all of its subsidiaries and affiliated companies, and the officers, directors, employees, agents and representatives thereof.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

INTERROGATORY NO. 30. Identify all persons, businesses, and entities involved in the

proliferation of each Subject Hookah categorized by each Subject Hookah and by the following stages of development:

- a. the creation of each Subject Hookah, including its conception;
- b. the design of each Subject Hookah;
- c. the development of each Subject Hookah;
- d. the production of each Subject Hookah;
- e. the manufacture of each Subject Hookah, including quantities manufactured for Defendant;
- f. the transfer of each Subject Hookah to any property owned, leased, controlled, or accessed for commercial purposes by the Defendant; and
- g. the marketing and advertisement of each Subject Hookah.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the grounds it is unduly burdensome and seeks information that is irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 31** Identify each source, quantity, and dollar amount of each Subject Hookah sold by Defendant in the United States arranged with reference to each Subject Hookah and each transaction.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

INTERROGATORY NO. 32 Identify each commercial purchaser, the total quantity, and total dollar amount of each Subject Hookah vended by Defendant in the United States, arranged with

reference to each Subject Hookah and commercial purchaser (together with a single "catch---all" category titled "direct consumer purchases").

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 33.** Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as AMY-018 and the Econo-MYA QT depicted in Exhibit 4.

SUPPLEMENTAL ANSWER: In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding, particularly as it seeks the comparison of disparate objects for no purpose. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 34.** Describe each product design difference perceptible to Defendant between the Subject Hookah labeled as Jinn and the MYA QT depicted in Exhibit 5.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Interrogatory on the ground that it seeks information that is irrelevant to the subject matter of the pending Proceeding, particularly as it seeks the comparison of disparate objects for no purpose. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: No hookahs have been sold in the United States under the AMY GOLD TOBACCO MOLASSES (design) mark. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 35.** Identify any and all documents responsive to the foregoing interrogatories or other Document Request issued by Plaintiff in this action which are lost or unavailable and identify the date(s) the loss or unavailability was first discovered, the person(s) who first discovered the loss or unavailability and the person(s) most knowledgeable about the contents of such lost or unavailable documents.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

**INTERROGATORY NO. 36.** Identify all persons who participated in any way in the preparation of the answers or responses to these interrogatories and state specifically, with reference to interrogatory numbers, the area of participation of each such person (excluding only Applicant's lawyers or their representatives).

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the ground that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: The persons who provided information are Mr. Ibrahim Dabes and Mrs. Larissa Stempfle. This supplemental answer contains HIGHLY CONFIDENTIAL information.

**INTERROGATORY NO. 37.** Identify any study, research, focus group, testing or similar validation procedure employed by Defendant or any person or entity at Defendant's request or on behalf of Defendant to determine the presence and/or absence of any confusion between Plaintiff's Products and the Defendant's Products when offered under the applied---for designations or AMY Brand generally.

**SUPPLEMENTAL ANSWER:** In addition to the general objections above, Applicant objects to this Interrogatory on the grounds that it seeks information that is irrelevant to the subject matter of

the pending Proceeding. Additionally, Applicant objects to this Interrogatory on the grounds that it seeks information which is privileged and/or attorney work product. Notwithstanding and without waiving these objections, Applicant answers this Interrogatory as follows: None. This supplemental answer contains CONFIDENTIAL information.

Date: June 24, 2015 Respectfully submitted,

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL 21355 East Dixie Highway, Suite 115 Miami, Florida 33180

Ph: 305 830-2600 Fax: 305 830-2605

Email: tmmiami@fggbb.com

Attorneys for Applicant Dabes, Ibrahim

## **CERTIFICATE OF SERVICE**

It is hereby certified that a copy of this SUPPLEMENTAL ANSWERS AND OBJECTIONS TO OPPOSER'S FIRST SET OF INTERROGATORIES TO APPLICANT IBRAHIM DABES was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Opposer, on this 24th day of June 2015.

/Paul D. Bianco/_

Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application No.	86/025,182			
For the Mark: AMY	GOLD TOBACC	O MOLAS	SES (design)	
Published in the Office			` •	
Mya Saray, LLC,		)		
		)		
	Opposer,	)	Opposition No.: 91218280	
		)		
V.		)		
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Dabes, Ibrahim DBA		)		
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	Applicant.	)		
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# SUPPLEMENTAL ANSWERS AND OBJECTIONS TO OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION TO APPLICANT IBRAHIM DABES

Applicant incorporates by reference the preliminary statement and General Objections made to the original set of Response and Objections to Opposer's First Set of Requests for Production to Applicant Ibrahim Dabes.

## SUPPLEMENTAL ANSWERS TO REQUESTS

**REQUEST NO. 1:** All documents that are identified in, or should have been identified in, or concern or relate to your answers to Plaintiff's First Set of Interrogatories to Defendant Dabes, including but not limited to, any documents you used or referred to in answering the Interrogatories.

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith, Bates numbered 00001-00143.

**REQUEST NO. 2:** All licenses or other documents provided to you constituting permission from a government entity or subdivision – federal, state or local – to perform acts in commerce, including those related to buying/selling of tobacco and related products, permissions for importation of goods, zoning variances, etc.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 3:** All documents that reflect or reference a sale of any Subject Hookah to any Distributor in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00054-00070.

**REQUEST NO. 4:** All documents that reflect or reference a sale of any Subject Hookah to any Retailer in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 5:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Distributor in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: For documents that show sales to distributors for goods marked with the AMY DELUXE (DESIGN) mark, see documents attached to Request No. 1, Bates numbered 00054-00070.

**REQUEST NO. 6:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Brand to any Retailer in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 7:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Distributor in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 8:** All documents that reflect or reference a sale of any of Defendants Products with the AMY Logo to any Retailer in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This

supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 9:** A physical specimen of each Subject Hookah.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: The hookahs "AMY-018" and "Jinn" are no longer sold in the US. For photographs of the "AMY-018" and "Jinn" hookahs, please see Bates Stamped documents 00013 and 00118, respectively.

**REQUEST NO. 10:** All documents and things that relate or refer to, or describe Defendant's inventory of hookah products physically located in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 11:** All documents that relate or refer to, or describe, the locations for physical storage or warehousing of Defendant Products or packaging for Defendant Products in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 12:** All documents that relate or refer to, or result from, the Defendant's importation of Defendant Products into the United States since the adoption of the AMY Brand or commercialization of the Subject Hookahs (whichever is earlier). This will include correspondence, invoices, and any other documents from manufacturers, importers, freight forwarders, customs agents, and others involved in the importation process.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00045-00053.

**REQUEST NO. 13:** All documents and things that refer or relate to the purchase or ordering of packaging with the AMY Logo or AMY Brand.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00054-00070.

**REQUEST NO. 14:** All documents and things that refer or relate to the creation, design, and appearance of the Subject Hookahs, including the creation design and appearance of alternatives.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 15:** All documents and things that refer or relate to the creation, design, and appearance of the AMY Logo, including the creation design and appearance of alternatives.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad and unduly burdensome. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 16:** All documents and things that refer or relate to the creation, design, and appearance of the AMY Brand, including the creation design and appearance of alternatives.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 17:** All documents and things relating or referring to design differences between the Subject Hookahs and any Plaintiff hookah.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 18:** All documents and things that refer or relate to communications between the Defendant and between any person involved in the design, production, shipping, or storage of the Subject Hookahs.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects

to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 19:** All documents and things that refer or relate to any complaint from any consumer, Retailer, or Distributor regarding any Subject Hookah or Defendant Product bearing the AMY Logo or AMY Brand.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 20:** All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 21:** All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections,

Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 22:** All documents and things related to the advertising, publicity, or marketing of the Subject Hookahs and Defendant Products in which the Defendant depicted either the AMY Brand or Subject Hookahs in the United States.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00001-00044.

**REQUEST NO. 23:** All invoices, media, schematics, proofs, drafts, and other documents related to the creation of the AMY Logo or the AMY Brand, including any trademark clearance opinions or contracts with third party branding consultants.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 24:** All documents characterizing any belief by a third party that a MYA Product or a Defendant Product are from a common source (including, believing a MYA Product to be a Defendant Product, vice versa, believing that Plaintiff and Defendant share a common manufacturing source, etc.).

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections,

Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 25:** All documents characterizing a design of a MYA Product or MYA Trademark.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 26:** All documents and things related to the ability of a Retailer or Distributor or end---user to order the Subject Hookahs and Defendant Products (e.g., catalogues, product specifications, etc.).

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00071-00138.

**REQUEST NO. 27:** All documents and things that refer or relate to the submission, review, clearance, rejection, approval, or registration with any governmental agency or supplier of any aspect of the Subject Hookahs or the AMY Brand or AMY Logo.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 28:** All documents and things that refer or relate to the costs of manufacturing, acquiring parts and materials for, and Defendant's purchase (if any) of the Subject Hookahs.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents attached to Request No. 1, Bates numbered 00071-00138.

**REQUEST NO. 29:** All documents and things relating to visits and communications to any store, retail outlet, or other business engaged in the sale of Defendant Products in the United States visited by any employee, representative, agent, official, executive and/or director of the Defendant for purposes relating to creating or continuing sales of Defendant Products.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 30:** All Documents and things that describe, illustrate, or depict your corporate or organizational structure, or any group assignment, including, but not limited to, organizational charts.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 31:** Documents and things concerning your document retention policies.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 32:** All documents constituting or concerning reports prepared by any expert whom you expect to call at trial, including draft reports.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 33:** All documents provided by you to any expert witness retained by you for this action.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 34:** Any and all statements taken of any person regarding any aspect of Plaintiff's claims or the allegations in this action or any defense to those claims or allegations.

**SUPPLEMENTAL ANSWER:** In addition to the General Objections above, Applicant objects

to this Request on the grounds that it is overly broad, unduly burdensome and irrelevant to the subject matter of the pending Proceeding. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 35:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your First Affirmative Defense (Failure to State a Claim).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 36:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Second Affirmative Defense (Absence of Likelihood of Confusion).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: See documents produced herewith, Bates numbered 00001-00143.

**REQUEST NO. 37:** All documents that relate to, reflect, evidence, or constitute the factual and/or legal explanation, ground, or rationale for your Third Affirmative Defense (Lack of Damages).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without waiving these objections, Applicant answers this Request as follows: None. This supplemental answer contains CONFIDENTIAL information.

**REQUEST NO. 38:** All documents that relate to, reflect, evidence, or constitute the

factual and/or legal explanation, ground, or rationale for your Fourth Affirmative Defense

(Estoppel).

SUPPLEMENTAL ANSWER: See General Objections above. Notwithstanding and without

waiving these objections, Applicant answers this Request as follows: See documents produced

herewith, Bates numbered 00139-00143.

**REQUEST NO. 39:** All documents that relate to, reflect, evidence, or constitute the

factual and/or legal explanation, ground, or rationale for your Fifth Affirmative Defense

(Laches).

SUPPLEMENTAL ANSWER: See General Objections above. Notwithstanding and without

waiving these objections, Applicant answers this Request as follows: See documents produced

herewith, Bates numbered 00139-00143.

**REQUEST NO. 40:** All documents that relate to, reflect, evidence, or constitute the

factual and/or legal explanation, ground, or rationale for your Sixth Affirmative Defense

(Acquiescence).

**SUPPLEMENTAL ANSWER:** See General Objections above. Notwithstanding and without

waiving these objections, Applicant answers this Request as follows: See documents produced

herewith, Bates numbered 00139-00143.

Date: June 24, 2015

Respectfully submitted,

/Paul D. Bianco/

Paul D. Bianco

FLEIT GIBBONS GUTMAN BONGINI & BIANCO PL

21355 East Dixie Highway, Suite 115

Miami. Florida 33180

Ph: 305 830-2600

Fax: 305 830-2605

Email: tmmiami@fggbb.com

13

Attorneys for Applicant Dabes, Ibrahim

## **CERTIFICATE OF SERVICE**

It is hereby certified that a copy of this SUPPLEMENTAL ANSWERS AND OBJECTIONS TO OPPOSER'S FIRST SET OF REQUESTS FOR PRODUCTION TO APPLICANT IBRAHIM DABES was served by First Class Mail to M. Keith Blankenship, Esq., Da Vinci's Notebook, LLC, 10302 Bristow Center Dr. #52, Bristow, VA 20136, Attorney for Opposer, on this 24th day of June 2015.

/Paul D. Bianco/

Paul D. Bianco

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